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Updated - Plug In America Comments on 2025-26 Investment Plan Update Guiding Principles

Please see the attached document for updated comments from Plug In America. Our earlier comments had a small error. They listed the CEC's workshop on the 2025-2026 CTP Investment Plan Update Guiding Principles as taking place on April 30, 2035. We have corrected this to read April 30, 2025, per the workshop's date.

If possible, please remove our earlier comments in light of this updated version. Thank you.

Additional submitted attachment is included below.



California Energy Commission
715 P Street
Sacramento, California 95814

Docket No. 25-ALT-01

Re: 2025-2026 Investment Plan Update for the Clean Transportation Program - Proposed Guiding Principles

On behalf of Plug In America, thank you for the opportunity to comment on the 2025-2026 Investment Plan Update for the Clean Transportation Program (CTP) Guiding Principles. Plug In America is a nonprofit organization representing electric vehicle (EV) drivers across the U.S.

Overall, we appreciate the CEC's careful consideration in developing the proposed guiding principles. We support the CEC's proposal to create a multi-year funding plan to create additional certainty for the CTP. This is a simple, effective way to outline a clearer pathway for funding investments through the CTP and offers a better understanding for both industry and consumers on what they can expect from the program. We also support the CEC's intention to continue funding infrastructure across the light-, medium-, and heavy-duty vehicle segments.

Plug In America strongly supports the CEC's proposed principle of focusing funding efforts on deploying charging infrastructure in areas that are underserved by private investment, including multifamily housing (MFH), rural, and disadvantaged communities. Our surveys of current and prospective EV drivers consistently show that access to charging is one of the most significant considerations in assessing the EV experience and enabling EV adoption.¹ As such, Plug In America strongly supports CEC's intention to focus on not only increasing funding support for MFH charging but also identifying charging solutions for MFH residents.

As noted during the workshop on April 30, 2025, CEC is required by statute to ensure that at least 50% of CTP funding directly benefits disadvantaged and low-income communities in California. We urge the CEC to center this requirement and explore strategies that ensure initiatives funded benefit the communities in question. Additionally, we respectfully caution the CEC to carefully consider the potential unintended consequences of siting locations in disadvantaged and low-income communities, like additional traffic in the area or a shift in community demographics, and to employ appropriate guardrails to mitigate any potential consequences.

Plug In America broadly supports the CEC's proposed stronger emphasis on public charging. We understand that there are still many areas that need increased public charging options across California. We support the CEC in the intention to strategically assess direct current fast

¹ Plug In America, EV experience and charging surveys conducted from 2023-2024, <https://pluginamerica.org/survey/insights/>.

charging (DCFC) vs. Level 2 (L2) charging based on vehicle dwell times at various locations. We emphasize that the CEC should maintain robust support for L2 charging in locations with longer vehicle dwell times, such as near multi-family residences and large workplaces. One point of concern is the high cost of DCFC for installation and maintenance, as well as the cost to the consumer. Fast charging costs remain high for the driver, much higher than home charging options or public L2 charging. For drivers who frequently rely on fast public charging, these costs can erode the cost savings that are experienced in EVs through lower vehicle fueling and maintenance costs. We urge the CEC to keep this in mind when crafting funding opportunities focused on DCFC.

Thank you again for the opportunity to provide feedback and for your consideration of these comments. Please reach out to Alexia Melendez Martineau, Senior Policy Manager, Plug In America, at amartineau@pluginamerica.org if you have any questions or would like to discuss our comments further.

Sincerely,

Joel Levin
Executive Director, Plug In America