

**DOCKETED**

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*Comment Received From: Coalition for Clean Air  
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**CCA comments on 2025-2026 Investment Plan Update for the Clean Transportation Program Proposed Guiding Principles**

*Additional submitted attachment is included below.*



May 15, 2025

Commissioner Nancy Skinner  
California Energy Commission  
1516 Ninth Street Sacramento, CA 95814  
Docket #: 25-ALT-01

**Re: Revised Staff Draft Report – 2025-2026 Investment Plan Update for the Clean Transportation Program: Proposed Guiding Principles**

Dear Commissioner Skinner,

The Coalition for Clean Air strongly supported the CTP's reauthorization through AB 126 (Reyes) in 2023, particularly its equity requirements. We appreciate the work that went into the proposed guiding principles and the April 30 Advisory Committee meeting, and we offer these comments on the proposed principles.

We agree that "Infrastructure for light-duty ZEVs (such as passenger cars) and medium- and heavy-duty ZEVs (such as trucks and buses) is needed to reduce air and climate damaging pollution and reach state ZEV goals." We see a critical need to fund infrastructure for zero-emission medium and heavy-duty vehicles like trucks and buses. Replacing diesel engines that inflict toxic exhaust on our communities with engines that generate no tailpipe pollution is an urgent priority, especially for our low-income communities of color. California's Black, Asian-American and Latino communities are burdened by much greater diesel particulate matter than are our White communities. CEC's investments in ZE infrastructure complement the regulatory structure established by CARB to clean up diesel pollution, and expediting that infrastructure deployment is vital to the success of the zero-emission transition. Furthermore, we urge CEC to continue to exceed the minimum percentages established by AB 126 for investments in and benefitting disadvantaged and low-income communities.

Fuel-cell electric vehicles may play an important role in medium and heavy-duty transportation, so we believe that public investment in hydrogen fuel should go toward stations that can supply trucks and buses. The market has not shown confidence in light-duty hydrogen; despite CEC's massive investment of over \$230 million, we have only 50 retail stations open (according to CEC's website). For these reasons, CEC should restrict funding for hydrogen refueling to medium and heavy-duty vehicle hydrogen infrastructure. The CTP should also assist in greening

the hydrogen fuel supply by prioritizing projects that use electrolytic hydrogen, to achieve lower life-cycle emissions of greenhouse gases and air pollution.

When it comes to charging for light-duty vehicles, we support the proposal to “Increase Support to Multifamily Homes, Continue Supporting Rural and Disadvantaged Communities,” because those Californians are the least likely to be served by charging infrastructure. As one of the leaders of the Charge Ahead California campaign, we advocate for a zero-emission transportation transition that leaves none of our residents behind.

The proposed emphasis on public DC fast charging has some advantages, particularly for long-distance travel, but should be closely examined from a cost-effectiveness and equity perspective. Public fast charging is usually the most expensive method for the customer. For those who have on-site parking and do not have lengthy commutes, Level 1 charging is a low-cost option that should be supported without burdensome restrictions; we urge CEC to open the Communities in Charge program to Level 1 projects. For those low-income residents without on-site parking, Level 2 or DC fast charging should be made available at costs comparable to those paid by inhabitants of single-family housing.

In addition to the investments proposed by the draft staff report, CEC has a crucial regulatory role to play in cleaning up transportation, the biggest source of air and climate pollution in our state.

- **ZE Infrastructure Reliability:** For transportation electrification to succeed, the refueling experience must be dependable and convenient. Drivers should be able to approach a public charging (or hydrogen) station – especially one that has been built with public funds -- with the same confidence with which they would drive into a gas station. Unfortunately, this is not always the case at present. Therefore, we support look forward to seeing CEC’s revised *Proposed Regulations for Electric Vehicle Charger Inventory, Utilization, and Reliability Reporting* soon.

- **Replacement Tire Efficiency:** Currently, almost all new cars are equipped with low rolling resistance tires that boost each new car's efficiency and reduce emissions. However, when California consumers go to purchase replacement tires for their cars, they are unaware that almost all replacement tires sold throughout the state are not low-rolling resistance tires. As a result, once they replace their car's tires, they are unknowingly spending more money on fuel, whether it be gasoline, electricity or hydrogen, and increasing the amount of pollution that is caused by their vehicle.

CEC should adopt its proposed Replacement Tire Efficiency Program, a first-in-the-nation tire fuel efficiency standard for passenger vehicle replacement tires sold in California that aligns with

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the tires sold with new cars, along with consumer outreach and education at the point of sale so California drivers can easily compare tire efficiency, safety, and other attributes.

I look forward to continuing to collaborate on CEC investments and regulations.

Respectfully,

A handwritten signature in black ink that reads "Bill Magavern". The signature is written in a cursive, flowing style.

Bill Magavern  
Policy Director