DOCKETED	
Docket Number:	25-ALT-01
Project Title:	2025–2026 Investment Plan Update for the Clean Transportation Program
TN #:	263118
Document Title:	Marissa Wu Comments - The Greenlining Institute Comments on 25-26 Proposed Guiding Principles
Description:	N/A
Filer:	System
Organization:	Marissa Wu
Submitter Role:	Public
Submission Date:	5/15/2025 12:01:24 PM
Docketed Date:	5/15/2025

Comment Received From: Marissa Wu
Submitted On: 5/15/2025
Docket Number: 25-ALT-01

The Greenlining Institute Comments on 25-26 Proposed Guiding Principles

Additional submitted attachment is included below.

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May 15, 2025

California Energy Commission
715 P Street
Sacramento, CA 95814

Submitted electronically

Re: Docket 25-ALT-01 (2025-2026 Investment Plan Update for the Clean Transportation Program)

Introduction and Summary of Recommendations

The Greenlining Institute ("Greenlining"), works toward a future where communities of color can build wealth, live in healthy places filled with economic opportunity, and are ready to meet the challenges posed by climate change. We greatly appreciate the opportunity to submit comments to the California Energy Commission (CEC) to guide the development of the 2025-2026 investment plan.

We welcome Commissioner Skinner's leadership to the Clean Transportation Program (CTP) and express our appreciation to the CEC team for their work on the 2025-26 Proposed Guiding Principles. We make the following recommendations, as summarized:

1. Invest 100% of funds into disadvantaged communities to address persistent equity gaps in electrification across California.
2. Address interoperability issues as a barrier to ZEV adoption in disadvantaged communities.
3. Coordinate investments and fund technical assistance in charging for renters and multi-family housing, as well as in clean transportation workforce development.
4. Carefully consider secondary impacts and opportunities of public DC fast charging (DCFC), including affordability, power grid upgrades, and community benefits opportunities.
5. Limit hydrogen investments to medium- and heavy-duty infrastructure and implement an equity-centered definition of green hydrogen.
6. Ensure ample timelines for public comment and community input.

Below, please see elaborations on these recommendations:

Increasing Investments to Address Persistent Equity Gaps

We appreciate the CEC's continued spotlight on the importance of increasing equity in California's clean transportation transition. This remains a top priority, especially in light of recent studies demonstrating that there is still much work to be done to achieve an equitable green transition. Although California has been successful in reducing overall PM2.5

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transportation emissions, relative pollution exposure inequities persisted or even worsened across AB 617 and SB 535 communities and for people of color.[1] Furthermore, while California has invested nearly $2B in clean vehicle incentives since 2010, only 15% of funds have reached disadvantaged communities (DACs) where electric vehicle (EV) adoption continues to lag behind.[2]

While the CEC has been fulfilling AB 126's mandate to direct at least 50% of CTP funds towards projects that directly benefit or serve DACs and low-income communities, environmental equity for these communities has not improved accordingly. As such, we recommend increasing investments to 100% into DACs for the 2025-26 CTP investment plan in order to expedite California's ability to address these persistent inequities.

Address Charging Interoperability to Increase ZEV Access

As Greenlining has previously submitted[3], we want to uplift the need to address interoperability as an equity issue. While EV sales are surpassing statewide goals at large, EV adoption for low-income and disadvantaged households is still lagging behind. As technology rapidly advances, we are concerned about interoperability issues with older EVs that reduce access to EVs and create charging reliability problems that hurt public perception of EVs and EV charging. It is important to address interoperability issues in order to encourage EV uptake in low income and disadvantaged communities and improve the driver experience.

Coordinate Investments in At-Home Charging and Workforce Development and Fund Technical Assistance

We commend CEC's emphasis on increasing support to Multifamily charging, Rural charging, and DACs to help continue addressing persistent equity gaps. We recommend funding technical assistance to ensure that this support reaches the target communities. Additionally, in order to streamline state charging investments and align clean transportation efforts, we recommend that CEC coordinate with CARB in rolling out charging infrastructure investments and vehicle incentives.

While not explicitly addressed in the 2025-26 Proposed Guiding Principles, workforce development goes hand-in-hand with expanding California's charging infrastructure. As previously written,[4] CEC has the opportunity to shape the trajectory of the green economy and encourage a just transition by incorporating labor standards and enforcement into CTP funding requirements to ensure that new clean transportation jobs being created are also high-quality,

[1] Libby H. Koolik et al., "PM2.5 exposure disparities persist despite strict vehicle emissions controls in California," Science Advances (September 2024)

[2] Rachel Connolly et al., "An Analysis of California Electric Vehicle Incentive Distribution and Vehicle Registration Rates Since 2015," UCLA Luskin Center for Innovation (June 2024)

[3] Greenlining Comments on EV Charging Reliability Second Draft (April 2024)

[4] Marissa Wu Comments - The Greenlining Institute Comments on 24-25 CTP Updated Draft (October 2024)

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high road jobs[5] that community members from DACs can access. See UC Berkeley Labor Center's Workforce Standards Toolkit[6] for more information.

Similarly, we recommend that CEC continues to coordinate workforce development investments across agencies with CARB and with community and labor partners to ensure that efforts are streamlined. Wherever possible, utilizing existing union pathways for training and certification can conserve state resources. We would like to reference our previous comments[7] for further workforce development considerations with the CTP.

Secondary Impacts and Opportunities for DCFC

We understand that prioritizing DCFC for public charging has the advantage of reducing the number of public chargers needed. However, we are concerned that DCFC is significantly more expensive than L1 and L2 charging for drivers, which would reduce accessibility for low income community members— who are also more likely to be renters or live in multifamily housing without home charging, and therefore must rely on charging outside the home. We recommend CEC explore options for low-income EV drivers to access financial support, such as a voucher for public DCFC charging, to proactively address these anticipated challenges.

In addition to the increased cost to drivers, DCFC may also be costlier for the state if power grid upgrades are needed before fast charging can be installed in certain locations. We recommend CEC includes installation and power grid upgrades in their cost analysis for implementing DCFC.

We also want to uplift additional potential secondary impacts for public DCFC. Because DCFC allows for increased throughput of vehicles, DCFC charger locations should be carefully considered to avoid inadvertently funnelling traffic through formerly-redlined neighborhoods. While EVs do not produce tailpipe emissions, studies have shown that concentrations of secondary aerosols may increase with higher EV adoption and lead to increased mortality rates, based on particular geographies and atmospheric conditions.[8] As such, ZEV traffic still creates specific types of pollution, and mitigating ZEV traffic should be taken into account to ensure that DCFC placements do not negatively impact the surrounding communities and exacerbate inequities. Additionally, increased traffic can increase road maintenance needs as well as traffic safety issues. We recommend CEC engage with local communities to further consider these secondary impacts where charger sites are being considered and proactively mitigate them.

Finally, CEC should also proactively consider opportunities to implement community benefits with DCFC stations.This could include labor standards on station construction, charger installation and maintenance, local and targeted hire requirements, as well as additional

[5] Carol Zabin, "Putting California on the High Road: A Jobs and Climate Action Plan for 2030", UC Berkeley Labor Center (June 2020)
[6] Factsheet: Workforce Standards for an Equitable Economy, UC Berkeley Labor Center (March 2024)
[7] Marissa Wu - Greenlining - Comments on CTP ZEV Workforce Training and Development Strategy (July 2024)
[8] University of Houston Study Shows Electric Vehicles Can Have Positive Impact on Air Quality and Public Health in Some Cities, Not All, University of Houston (June 2024)

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economic development opportunities that allow revenue generated from chargers to help fund local community priorities.

Comments on Hydrogen

Greenlining has voiced numerous concerns around CEC's hydrogen investments over the last year. These concerns persist in the 2025-26 Proposed Guidelines. We ask that CEC reference our joint letter[9] on last year's CTP hydrogen investments, and specifically uplift a few key concerns.

Most pertinently, hydrogen funding should be restricted to only medium- and heavy-duty infrastructure in the CTP. MDHD creates disproportionately high levels of emissions that impact frontline communities along freight corridors. Electrifying MDHD to reduce pollution inequities across the state is a priority that hydrogen can currently support. However, light-duty hydrogen vehicles have not found widespread market success, and we do not support continuing to pour limited state funds into light-duty hydrogen when battery electric vehicles have demonstrated consumer popularity while also being more environmentally-friendly. According to the CEC's own data,[10] more than 95% of hydrogen is produced from fossil fuels, which runs counter to the CTP's purpose and state climate goals. As such, Greenlining recommends that CEC limits hydrogen investments to only hard-to-electrify MDHD sectors and implements a strong, equity-centered definition that requires investments only go towards green hydrogen. Additionally, we ask that undersubscribed hydrogen funds and canceled hydrogen projects should be reallocated into battery electric infrastructure.

Procedural Comments on Public Comment Timelines

Public feedback is extremely important for ensuring that state investments are serving the communities most in need. In the past, CTP public comment periods have been as short as 8 business days, which is insufficient for advocates and community members alike to provide thoughtful feedback. In contrast, however, OAL guidance,[11] which CARB and CPUC both follow, requires 45 days for written comments on proposed regulations. We encourage CEC to adopt OAL guidance going forward for public comment deadlines.

Additionally, if CEC moves forward with only having one CTP draft open to feedback rather than the two drafts that there were last year, ample public comment opportunities and timelines will be even more important so that stakeholders can thoroughly provide feedback.

[9] 19 Organizations on Hydrogen Concerns in 24-25 CTP Updated Draft (October 2024)
[10] "Hydrogen Fact Sheet", California Energy Commission (June 2021)
[11] About the Regular Rulemaking Process, Office of Administrative Law

We appreciate the opportunity to comment on the CEC's proposed investment plan and show support for the proposed battery electric investments overall, but continue to have strong concerns with CEC's proposed hydrogen investments.

We look forward to continuing to track progress on this effort. Please do not hesitate to reach out to me (marissa.wu@greenlining.org) with any questions or to schedule time to discuss our recommendations further.

Best regards,

Marissa Wu
Senior Transportation Equity Program Manager