

**DOCKETED**

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**Electric Vehicle Charging Association Comments \_ 2025-26 CTP  
Investment Plan Update Guiding Principles**

*Additional submitted attachment is included below.*

May 15, 2025

California Energy Commission  
Docket No. 25-ALT-01  
715 P Street  
Sacramento, CA 95814

**RE: Docket No. 25-ALT-01 - 2025-2026 Investment Plan Update for the Clean  
Transportation Program Proposed Guiding Principles**

Dear Commissioners and Staff,

The Electric Vehicle Charging Association (EVCA) appreciates the opportunity to provide feedback on the 2025-26 Investment Plan Update for the Clean Transportation Plan Proposed Guiding Principles and would like to thank staff for their continued work and leadership in supporting EV charging infrastructure deployment in California.

EVCA is a not-for-profit trade organization of over 20 leading companies within the electric vehicle charging ecosystem, established in 2015 to comprehensively represent the entire EV charging value chain for policymakers throughout the West Coast.

EVCA greatly appreciates the Commission's work in developing guiding principles for future funding allocations under the *2025-2026 Investment Plan Update*. In particular, we would like to thank the Commission for incorporating two principles requested in EVCA's previous comments: flexibility around funding and a continued balance of funding between light-duty and medium- and heavy-duty ZEV infrastructure. The charging needs of EV drivers and fleet owners are diverse, and the industry has responded with innovative charging solutions across the light- and medium- and heavy-duty sectors. Equitable support for both light-duty EV charging and medium- and heavy-duty charging as well as flexibility of funding that allows for responsiveness to changes in the industry and changes in federal, state, local, and private funding will ensure the market is adequately supported and able to continue evolving, enabling and supporting infrastructure development at the scale needed to meet the state's clean transportation goals.

EVCA also supports the proposed guiding principle focusing on using a multiyear funding plan to provide increased certainty and more stability. To the extent possible, EVCA would also encourage the Energy Commission to focus on simple, predictable, and durable

cycles of future solicitations for the CEC's grant programs when rolling out this funding. Predictable and reliable funding cycles provide applicants with the certainty and market stability needed for more efficient capital planning and, as a result, the development of higher-quality projects that better meet the CEC's specifications and the state's infrastructure needs. Even with varying levels of funding, a standardized application window would provide more certainty for applicants working to achieve California's nation-leading EV charging deployment goals, stability that is increasingly important considering California's current Low Carbon Fuel Standard credit market dynamics, upward pressure on electricity rates, and emerging deployment opportunities in other regions.

In closing, EVCA greatly appreciates the Commission's consideration of stakeholder feedback and we look forward to continuing to engage with the CEC in our shared goal of ensuring California's charging investments are best suited to meet the state's critical climate goals.

Sincerely,

**Reed Addis**

Governmental Affairs

Electric Vehicle Charging Association