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| Docket Number: | 25-ALT-01 |
| Project Title: | 2025–2026 Investment Plan Update for the Clean Transportation Program |
| TN #: | 263121 |
| Document Title: | CalETC Comments on the Investment Plan Principles May 2025 |
| Description: | N/A |
| Filer: | System |
| Organization: | CalETC |
| Submitter Role: | Public |
| Submission Date: | 5/15/2025 1:12:11 PM |
| Docketed Date: | 5/15/2025 |

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

CalETC Comments on the Investment Plan Principles May 2025

Additional submitted attachment is included below.



May 15, 2025

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

Submitted electronically to <https://efiling.energy.ca.gov/EComment/EComment.aspx?docketnumber=25-ALT-01>

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

The California Electric Transportation Coalition (CalETC) appreciates the opportunity to provide comments on the Proposed Guiding Principles for the 2025-2026 Investment Plan Update for the Clean Transportation Program (Guiding Principles). CalETC would like to thank the CEC and the Advisory Committee for all your hard work on the Clean Transportation Program (CTP) and your commitment to developing equitable, reliable, and ubiquitous zero-emission charging and hydrogen fueling networks across the state.

CalETC supports and advocates for the transition to a zero-emission transportation future to spur economic growth, fuel diversity and energy independence, contribute to clean air, and combat climate change. CalETC is a non-profit association committed to the successful introduction and large-scale deployment of all forms of electric transportation. Our Board of Directors includes representatives from: Los Angeles Department of Water and Power, Pacific Gas and Electric, Sacramento Municipal Utility District, San Diego Gas and Electric, Southern California Edison, Southern California Public Power Authority, and the Northern California Power Agency. In addition to electric utilities, our membership includes major automakers, manufacturers of zero-emission trucks and buses, electric vehicle charging providers, and other industry leaders supporting transportation electrification.

CalETC supports creating a multi-year funding plan to demonstrate the CEC's long-term priorities. A multi-year funding plan would provide market participants with a better understanding of what kinds of charging and refueling projects will be supported over the years. CalETC understands that state funding above and beyond the approximately \$100M annual CTP funding can fluctuate, however the market signal sent by a multi-year funding plan is still very valuable to demonstrate the direction the CEC is headed in over the course of the coming years. Additionally, CalETC strongly urges the CEC to provide clear, long-term schedules for workshops and solicitations for your signature block grant programs. The "start/stop" nature of some infrastructure incentive programs, including CALeVIP and Communities in Charge, leads to market uncertainty for both investors and charging station providers at a time when we need to rapidly accelerate construction and energization of new electric vehicle charging stations.

To the extent possible, CalETC recommends setting a schedule for regular funding windows where funding can be annually allocated and verified. By providing clarity on the timing of future funding opportunities charging station providers to plan and scale their investments to meet our shared EV infrastructure goals.

CalETC recommends allocating more funding to the CEC's signature block grant programs to deploy infrastructure at scale, instead of using competitive solicitation for grants. The pace of EV adoption and the state's ambitious goals requires us to use the fastest approach for established charging and hydrogen refueling market segments. The block grant programs are competitive, require submission of significant documentation, and the CEC's third-party administrators scrutinize applications to ensure awards are made to reputable applicants. Even with this thorough oversight, the turnaround for the most recent CALeVIP 2.0 was roughly three months between the application deadline and notice of award.¹ The CEC's funding can be deployed thoughtfully and rapidly through its signature block grant programs to meet our shared charging goals.

CalETC supports prioritizing DCFCs in the near term and maintaining funding for L2 at multifamily housing and workplaces. Ultimately, we will need all types of charging to achieve our goals, however, to spur mass market adoption we must build confidence among users that a ZEV can complete all their trips, even those that require DCFC. DCFC must be widely available to satisfy immediate charging needs across a diversity of use cases, including ride-share, long-distance trips, high mileage daily drivers, and multifamily residents with limited or no access to home charging. A public DCFC station inherently supports all potential EV customers who may need to travel in that region. While DCFC is more expensive to install than L2 on a charger-by-charger basis and may require additional grid planning to ensure sites can be energized, the CEC's analysis shows DCFCs have a stronger business case in the near term. Typically, DCFC is more expensive for drivers, so it is imperative that California continue to build on solutions to enhance the affordability of fast charging for income-qualified EV drivers that may not have access to charging at home, including the \$2,000 charging card that is part of CARB's rebate and assistance programs and the California Integrated Travel Project's Universal ZEV Equity Charging Card.²

L2 is effective for longer dwell time charging at workplace, curbside, commercial, or residential locations. There are barriers that need to be overcome to install widespread charging at existing multifamily housing, but it is imperative to overcome those barriers so multifamily housing residents can take advantage of low-cost charging on residential rates. The Zero-Emission Vehicle Infrastructure Plan (ZIP) shows that the California Green (CalGreen) Code will help by requiring the installation of L2 and low-power L2 (20- amp receptacles) in newly constructed multifamily housing, totaling over 160,000 chargers by 2030. Longer dwell time charging provides opportunities to use automated load management systems (ALMS) to improve charging performance and reduce the upstream impacts to the grid.

¹ Applications were due December 12, 2023, and awardees were notified by March 4, 2024. See <https://calevip.org/incentive-project/gssp-incentive-north-south>.

² Valley CAN and the State of California issue preloaded, reloadable contactless debit cards for low-income EV owners to use at any charging station, CallTP, August 1, 2022, available at <https://www.calitp.org/press/valleycan-preloaded-reloadable-ev-charging>.

CalETC recommends the CEC include a Level 1 EV charging option that meets safety and technology standards at assigned parking spaces in the Communities in Charge Program. Level 1 can be a convenient charging option for drivers when there is sufficient parking to allow drivers to charge for long periods of time. Research by Peninsula Clean Energy has shown that Level 1 charging would meet about 95% of everyday drivers' needs.³ Additionally, Level 1 charging is inexpensive compared to faster charging. Level 2 chargers cost approximately \$13,000 per charger, whereas Level 1 chargers are approximately \$2,500 per charger. We need to rapidly scale charging infrastructure, and all solutions must be funded to reach our 2030 goals. For these reasons, we encourage the CEC to include Level 1 charger options that meet the required safety and technology standards as eligible equipment in the Communities in Charge Program.

CalETC supports funding light-, medium-, and heavy duty charging and refueling infrastructure, and supports the CEC's willingness to balance funding based on what is allocated in the state budget and market needs. CalETC supports co-locating light-duty (LD) and medium- and heavy-duty (MHD) charging and refueling stations, but we strongly recommend that solicitations or changes to the block-grant programs ensure flexibility and do not limit applicants or site types. Last year CalETC made similar recommendations when the CEC and Caltrans approached the issue of colocation with the NEVI program. We continue to support program flexibility that would give a plus up in funding for applicants that seek to collocate 150 kW stations with 350 kW stations, which could also serve MHD ZEV trucks. These sites would need to be designed with dual purpose pull-through parking lanes so MHD trucks and LD ZEVs towing a trailer could easily charge. Creating a dual purpose plus up for stations that can serve both LD and MHD ZEVs would help California make strides to achieve its ambitious charging goals.

Thank you for your consideration of our comments. Please do not hesitate to contact me at Laura@caletc.com should you have any questions.

Kind regards,



Laura Renger
Executive Director

³ *Commute & Multifamily EV Charging Level Needs Analysis*, Peninsula Clean Energy, Available at <https://www.peninsulacleanenergy.com/wp-content/uploads/2021/09/Determining-the-Appropriate-Level-of-Power-Sharing-for-EV-Charging-in-Multifamily-Properties.pdf>.