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**GRID Alternatives Comments_ 25-26 Transportation Investment
Plan Guiding Principles**

Additional submitted attachment is included below.



May 16, 2025

California Energy Commission
1516 Ninth Street
Sacramento, CA 95814-5512

VIA DOCKET
Energy Commission Docket 25-ALT-01

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

Dear Commissioner Skinner and Energy Commission Staff:

GRID Alternatives ("GRID") is the country's largest nonprofit that builds community-powered solutions to advance economic and environmental justice through renewable energy. Since 2004, we've installed clean energy technologies for over 30,000 income-qualified households across the country. In recent years, we have paired our longstanding work on solar PV with increased access to electric vehicles, EV charging stations and battery storage deployment for income-qualified families, multifamily housing owners and community facilities in economic and environmental justice communities.

We appreciate the opportunity to submit the following comments regarding the Proposed Guiding Principles for the 2025-2026 Clean Transportation Program Investment Plan Update presented at the recent Advisory Committee meeting held on April 30th.

Guiding Principle: Increase Support to Multifamily Homes, Continue Supporting Rural and Disadvantaged Communities

GRID strongly supports the CEC's continued efforts to increase access to equitable EV charging infrastructure. Investments geared toward multifamily homes and disadvantaged communities will go a long way to close the equity gap in transportation electrification. California has a very high percentage of renters who face greater challenges accessing overnight EV charging at home, but have the greatest need for the low cost and high convenience that home charging provides. Roughly 45 percent of California residents are renters, many of whom live in multifamily housing.¹ In California, renters are more likely to be lower income than homeowners,² making it critical to focus investments not only *in* disadvantaged communities, but investments specifically *for* low income tenants. While a project may

¹ [Snapshot of Tenants in California, 2022. Tenants Together.](#)

² [Housing Burden \(calbudgetcenter.org\)](#)

be sited in a DAC, that does not necessarily indicate the investment is for low-income community members within the community. Safeguards are necessary within CEC investment programs to prevent this occurrence.

We strongly recommend that the CEC takes into consideration the various policy mechanisms within CEC funding programs to reduce barriers to access for low-income renters in disadvantaged communities. For example, a recurring theme expressed by multifamily property owners and managers that GRID has engaged with through our direct involvement in CEC funded programs is that the requirement to install chargers only at shared or unassigned parking spaces on the property premises is a barrier to entry. The reality is that guest spaces are often limited, or if they do exist, they are not the most desirable location for tenant access. Where certain requirements may be more compatible for new construction, EV charging installation at existing multifamily housing sites is limited to the on-site parking available. Unless the new development is specifically affordable units, reducing barriers to accessing funding for existing sites is key to EV charging access for low-income renters.

Furthermore, GRID is actively engaged with expanding clean energy and clean transportation projects within and for tribal communities. In respect to increasing access to EV infrastructure for multifamily housing, it's important to note that multifamily housing is not as common in tribal communities including on reservations, trust land, and fee land as it is in other parts of the state. Any emphasis on increasing funding for multifamily housing should not come at the expense of tribal community access to investments.

Guiding Principle: Stronger Emphasis on Public Fast Charging

GRID recognizes that investments for public fast charging can improve the overall experience for EV drivers. However, public charging in frontline communities is not equitably accessible to community members. Studies show that public charging is 2-6 times more expensive for EV drivers than charging at home,³ further emphasizing the importance to invest in ways for low-income households to charge at home where possible. In addition, equipment and installation of DCFC is expensive, with longer construction timelines that impede the desire for expediting transportation electrification.

Investments in DCFC can be coupled with programs to make public charging for low-income households more affordable. GRID has launched a national program, funded by the Joint Office of Energy and Transportation, GM, and Rivian Foundation, in partnership with the electric utility sector to pilot scalable models to bring existing utility low-income discount programs to public chargers.⁴ Four of these pilots are taking place in California, and will demonstrate a variety of tools to make public charging more affordable for renters. Our vision is the equivalent of EBT cards for food assistance, or discounted public transit cards, but for transportation fuel. These programs not only provide low-income renters the more affordable charging they need, they can also help unlock greater utilization rates for chargers installed in disadvantaged communities, similar to how EBT cards help bring business to grocery stores in low-income communities.

³ [Kandhra, D., MacCurdy, D., & Lipman, T. \(2024\). Multifamily Households Across California are Paying a Lot More to Charge Their Electric Vehicle. UC Office of the President: University of California Institute of Transportation Studies.](#)

⁴ <https://gridalternatives.org/affordable-public-charging>

Programming around subsidized access to public charging and public charging credits are an integral step towards increasing access to EVs in an equitable manner. In historically underserved communities, especially, we need to support community-based needs assessments, outreach, planning, and community engagement programs to increase utilization. Funding should favor investments that involve local residents and community groups in siting public charging infrastructure, which can create more community support and utilization.

Equity is best achieved with great attention to the details of process and policy guidelines of program investments. In the 2024-2025 Investment Plan, the CEC committed to not only invest more than 50 percent of funding to support projects benefiting low-income and disadvantaged communities as required by AB 126, but also to develop additional metrics for tracking benefits to increase equity and inclusion. We are encouraged by this intention, and look forward to supporting the Commissioners and staff in building upon these efforts within this year's investment plan update.

Sincerely,

Linda Khamoushian
Senior Clean Mobility Strategist
GRID Alternatives