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Greenlining Institute's Comments to the 2016-2017 Investment Plan Update for the Alternative and Renewable Fuel and Vehicle Technology Program – Draft Staff Report

Additional submitted attachment is included below.

November 16, 2015

Commissioner Janea A. Scott
California Energy Commission
1516 Ninth Street
Sacramento, CA 95814

Re: Comments to the 2016-2017 Investment Plan Update for the Alternative and Renewable Fuel and Vehicle Technology Program – Draft Staff Report

Dear Commissioner Scott and ARFVTP Staff:

Please find below The Greenlining Institute’s comments to the 2016-2017 Investment Plan Update for the Alternative and Renewable Fuel and Vehicle Technology Program (“ARFVTP”) – Draft Staff Report (“Staff Report”). We would like to acknowledge the hard work staff put into this report. It provides an excellent summary and analysis of the state of alternative and renewable fuels and vehicles available in California. It also provides a detailed account of why the Energy Commission staff supports the funding levels proposed.

Greenlining uplifts the clear prioritization given to diversity and inclusion within the ARFVTP in the Program Outreach and Inclusion section. This is consistent with the requirements of Assembly Bill 865 and encompasses the messaging and steps needed to support a transition to a more diverse clean energy economy. This prioritization will help the Energy Commission form strong partnerships outside of the clean transportation space and will help promote programs that better serve the transportation interests of all Californians.

Greenlining further supports the section dedicated to creative financing mechanisms entitled “Alternative Financing Mechanisms and Leveraged Funding.” The Energy Commission and all stakeholders have long acknowledged the relatively small amount of money dedicated to the ARFVTP. It is therefore essential that the Energy Commission bring forth ideas and projects that help to leverage this money through equitable financing programs. We find that work in partnership with the State Treasurer’s Office is an excellent strategy to accomplish this objective.

As public and private stakeholders continue to spend time and resources attempting to bring more charging stations into multi-unit dwellings, the Energy Commission has the opportunity through the ARFVTP to act as important catalyst. Staff reports that multi-unit dwellings account for 40% of housing

Greenlining Coalition:

4C Council of Santa Clara County
Allen Temple Baptist Church
American G.I. Forum
AnewAmerica
API SBP
Asian Business Association
Asian Inc.
Asian Journal
BBA-LA
Brightline Defense Project
CAABA-CAL
California Black Chamber
California Hispanic Chambers

California Journal for Film
California Rural Legal Assistance
Chicana/Latina Foundation
CHOC
Community Resource Project, Inc.
El Concilio of San Mateo County
Ella Baker Center for Human Rights
FAME Renaissance
Fresno Metro Black Chamber
Greater Phoenix Urban League
HAGA
Hispanic Chamber of Commerce - Alameda Co.
Hispanic Chamber of Commerce - Orange Co.

KHEIR Center
Korean Churches for Comm. Development
La Maestra Family Clinic
MAPA
Mentoring in Medicine & Science, Inc.
Mission Housing Development Corporation
Mission Language & Vocational School
NaFFAA
NAMCO
OCCUR
Our Weekly
Precinct Reporter Group
Rising Sun Energy Center

Sacramento Observer
San Francisco African American Chamber
Search to Involve Filipino-Americans
Southeast Asia Community Center
TELACU
The Unity Council
Time for Change Foundation
Visión y Compromiso
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West Angeles CDC
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stock, but only 4% of plug-in electric vehicle owners reside in apartments or condos; this is a huge problem that disproportionately impacts low and moderate-income residents and people of color. In California 16.8% of residents rent, with larger cities such as San Francisco and Los Angeles housing 40% renters.¹ Nation-wide, over a third of rented households make below \$20,000 a year.² Therefore, an equitable electric-vehicle strategy within California must have an aggressive plan for deploying charging stations in multi-unit dwellings.

Greenlining strongly supports the idea of having an Expert Advisor tasked with finding successful programs that maximize charging stations in multi-unit dwellings. As a short-term strategy, Greenlining recommends that the Energy Commission seek strategic pilot programs within low- to moderate-income communities that accelerate access to electric vehicle charging for residents who live in multi-unit dwellings (e.g. mobile charging stations). With Senate Bill 350 calling for the widespread adoption of electric vehicles in California, investor-owned utilities will now have to step up as strong partners in this space. Energy Commission pilot programs should coordinate with equity programs implemented by the California Air Resources Board in response to Senate Bill 1275. The Energy Commission should also coordinate with programs executed in partnership with the State Treasurer's Office to support these pilot programs.

Greenlining supports the programs and allocations dedicated to workforce investments. In particular, Greenlining supports the continued funding for apprenticeship programs that target underrepresented and underserved communities, including individuals living in disadvantaged communities and Disadvantaged Workers, as defined by the National Employment Law Project.³ Greenlining supports community hiring models promoted by the National Employment Law Project⁴ and recommends including language in ARFVTP solicitations that tie directly to workforce programs that support hiring from underserved communities and support the following hiring practices.

- At least 20% of the positions on the project will be performed by apprentices to ensure that opportunities will exist at the apprenticeship level.
- Ensure that the apprentices hired are participating in a high quality training program.
- Set a separate targeted hiring percentage for apprenticeship level positions. This is usually higher than the percentage for the overall workforce, out of recognition that many of the targeted beneficiaries will be coming in at the apprenticeship level.

To ensure the success of ARFVTP workforce investments and policies, Greenlining recommends increasing transparency and workforce data collection. Within the workforce funding category, there

¹ National Multifamily Housing Council, 2014, <http://nmhc.org/Content.aspx?id=4708>.

² National Multifamily Housing Council, 2014, <http://nmhc.org/Content.aspx?id=4708>.

³ Community Hiring Model Language: Why Do We Need It And How Does It Work?
<http://www.nelp.org/content/uploads/Community-Hiring-Description-and-Model-Language.pdf>.

⁴ Community Hiring Model Language: Why Do We Need It And How Does It Work?
<http://www.nelp.org/content/uploads/Community-Hiring-Description-and-Model-Language.pdf>.

should be reporting on how many of the individuals trained live in disadvantaged communities or qualify as a Disadvantaged Worker. Within solicitations in all categories there should be an opportunity to report on workforce diversity and efforts made by grant recipients to increase workforce diversity as recommended above. Where possible, there should be reporting on subcontractors and whether or not subcontractors used to carry out a solicitation qualify as a diverse-owned business.

Greenlining would like to flag for the Energy Commission that Senate Bill 350 requires the California Air Resources Board publish a report on the barriers to the expansion of zero-emission transportation options in disadvantaged communities, and recommendations on how to overcome those barriers. This report is due January 1, 2017 and will provide pertinent information that can inform the work of the Energy Commission's ARFVTP.

In all ARFVTP investments, Greenlining encourages the Energy Commission to seek out projects that encourage broader economic and health benefits for low-income communities, particularly disadvantaged communities impacted most significantly by poor air quality. This can be accomplished through strong workforce and supplier diversity investments and policies, investing directly in disadvantaged communities, and leveraging non-transportation related investments (e.g. affordable housing developments, solar investments, and energy efficiency upgrades).

Finally, Greenlining would like to underscore the value of the Energy Commission's regional alternative fuel readiness planning and implementation awards and encourage the Energy Commission to look for more opportunities to direct these planning grants into disadvantaged communities.

Thank you for drafting another successful Staff Report and thank you for the opportunity to comment. We look forward to continuing the discussion and supporting the Energy Commission in its goal of creating an equitable ARFVTP program that works for all Californians.

Sincerely,

Sekita Grant
Legal Counsel, Environmental Equity
The Greenlining Institute