

DOCKETED	
Docket Number:	19-TRAN-02
Project Title:	Medium- and Heavy-Duty Zero-Emission Vehicles and Infrastructure
TN #:	230559
Document Title:	Pacific Gas and Electric Comments - for Medium-and-Heavy Duty ZEV and Infrastructure Solicitation Concepts
Description:	N/A
Filer:	System
Organization:	Pacific Gas and Electric
Submitter Role:	Public
Submission Date:	11/8/2019 3:17:39 PM
Docketed Date:	11/8/2019

*Comment Received From: Pacific Gas and Electric
Submitted On: 11/8/2019
Docket Number: 19-TRAN-02*

**Pacific Gas and Electric Company Comments for Medium-and-Heavy Duty
ZEV and Infrastructure Solicitation Concepts**

Additional submitted attachment is included below.



Pacific Gas and Electric Company
77 Beale Street
San Francisco, CA, 94105

8 November 2019
California Energy Commission
Re: Docket No. 19-TRAN-02
1516 Ninth Street
Sacramento, CA 95814

Re: Pacific Gas and Electric Company Comments for Medium-and-Heavy-Duty Zero-Emission Vehicles and Infrastructure Solicitation Concepts

Pacific Gas and Electric Company (PG&E) appreciates the opportunity to comment on the upcoming Medium-and-Heavy-Duty (MDHD) Zero-Emission Vehicles (ZEV) and Infrastructure solicitation concepts related to the Energy Commission's *2019-2020 Investment Plan*. PG&E supports Assembly Bill (AB) 118, AB 109, and AB 8, creating the California Energy Commissions (CEC) Clean Transportation Program to develop and deploy alternative and renewable fuels and advanced technologies to help achieve the state's ambitious climate goals.

In support of Senate Bill 350, PG&E received approval from the California Public Utilities Commission (CPUC) to establish our EV Fleet Program, which provides incentives to reduce the cost of installing charging infrastructure for medium-and-heavy duty fleet customers. Our program offers significant cost offsets for electrical infrastructure work and additional EV charger rebates for eligible equipment to help encourage transportation electrification in the medium-and-heavy duty sector.

PG&E strongly supports allocating a minimum of \$40 million to Concept Two: Transit and Truck Fleets, Capital Expense for Zero-Emission Infrastructure Deployment. The following points demonstrate the need to allocate more funding for transit agencies and truck fleets in order to successfully meet the state's climate goals:

- California Air Resource Board's (CARB) *Innovative Clean Transit* regulation set a statewide goal for public transit agencies to gradually transition to 100 percent zero-emission bus fleets by 2040; requiring each transit agency to submit a rollout plan by 2020 for large transit agencies and 2023 for small agencies. Given that our EV Fleet program has been approved for only five years, the program is unable to support projects and plans beyond those five years thereby creating a gap between the regulation's stated goals for transit and our program's goals.
- In response to the *Innovative Clean Transit* regulation, Transit agencies are interested in leveraging funding from existing infrastructure incentives today to meet future goals. However, these projects are large in scope thereby increasing the overall project costs which can make it challenging for the project to be installed for both the customer and utility. Utility programs have set program budgets and strict targets for both the number of vehicles supported and the number of sites installed. These goals along with the approved program budgets create challenges in supporting these larger projects.
- Given the challenges in the timing of our EV Fleet program as well as the constraints on budget and program targets, we encourage the CEC to explore how funding from the CECs Concept Two has the potential to stack with utility-funded programs. This funding can help support transit agencies meeting the future needs, required under regulation, today.

Thank you for the opportunity to provide comments on the Medium-and-Heavy-Duty Zero-Emission Vehicles and Infrastructure solicitation concepts. We look forward to continuing our work with the CEC in achieving our state's climate change goals and supporting the medium-and-heavy-duty sector's transition to zero emission vehicles that help eliminate mobile emissions throughout California.

Sincerely,

David Almeida
Manager, Clean Energy Transportation
Pacific Gas and Electric Company