

DOCKETED

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**EBCE's Comments on the Investment Plan Update for the Clean
Transportation Program**

Additional submitted attachment is included below.



March 17, 2020

RE: 2020-2023 Investment Plan Update for the Clean Transportation Plan

Chapter 2: Context of the 2020-2023 Investment Plan – Funding Disbursement Mechanisms (p. 13-14)

East Bay Community Energy (EBCE) encourages the Energy Commission (CEC) to use the “First-Come, First-Served” funding mechanism more prominently in the 2020-2023 Clean Transportation Program (CTP) Investment Plan. As noted in the Draft Staff Report (Report), this mechanism allows for funding to be administered more quickly and with additional security to project applicants. The lack of certainty associated with “Competitive Solicitation for Grants” may discourage project teams from submitting applications. The amount of time and resources it takes to coordinate a competitive grant proposal cannot be understated, and project teams assume tremendous risk with no guarantee of selection and funding. Providing clear eligibility requirements and distributing funds on a first-come, first-served basis reduces this stakeholder risk and ensures well developed projects will be deployed in a timely manner.

Chapter 4: Zero-Emission Vehicles and Infrastructure – Light-Duty Electric Vehicle Charging Infrastructure, Technology Overview (p. 35)

The Report notes that, “...increased DC fast charging could be one solution to help address the lack of residential charging at multiunit dwellings.” EBCE strongly encourages the CEC to dedicate a portion of light-duty electric vehicle (EV) charging infrastructure funding within the CTP Investment Plan toward projects that deploy direct current (DC) fast charging that can serve residents of multi-unit dwellings (MUDs), as nearly half of the residents of Alameda County live in MUDs. EBCE has analyzed and mapped parcel and Co-Star data for the County’s MUDs (5+ units; within ¼ mile of each other) and found that 85% of multi-unit parcels were greater than 50 years old, and 70% of multi-unit buildings were greater than 50 years old. Additionally, of the 137,907 parking spaces in multi-unit buildings, 50% were greater than 50 years old and 39% were 20-49 years old. What this analysis demonstrates is that the vast majority of MUDs in Alameda County will likely have insufficient electrical capacity to enable simple and cost-effective integration of Level 2 charging infrastructure due to the vintage of these properties.

Therefore, it will be necessary to strategically deploy DC fast charging hubs near MUD hotspots to ensure renters have equal access to near-term charging solutions in Alameda County. Siting publicly available fast charging hubs conveniently located near where MUD residents live will kickstart EV adoption in a market that needs to scale. It would also result in higher utilization of the charging infrastructure generally as Alameda County's MUD hotspots are in close proximity to the busiest interstate corridors in the Bay Area. This is important because one-third of all regional commuter trips actually involve Alameda County with 47% of all trips originating outside the County. In turn, fast charging hubs strategically sited near MUD hotspots also have a high probability of being utilized by commuters, including ridesharing drivers, who may also be renters seeking access to charging solutions.

Chapter 4: Zero-Emission Vehicles and Infrastructure – Innovations in Charging Technology and Business Strategies (p. 39)

The Report notes that, "As more intermittent renewable energy is available to the electricity grid, such as solar and wind, the electricity supply available during the day will increase and possibly result in overgeneration." EBCE strongly encourages the CEC to include funding in the CTP Investment Plan for grid-responsive technologies and projects that increase resilience, such as deploying charging infrastructure and battery energy storage. Not only will these types of projects help increase load during the day when there are excess renewables on the grid, but they will also help facilities reduce the impacts of demand charges and improve resiliency in the face of Public Safety Power Shutoff events or other grid outage situations.

Chapter 4: Zero-Emission Vehicles and Infrastructure – eMobility (p. 40)

The Report states that eMobility funding would be, "...directed toward projects that provide clean shared light- and medium-duty vehicle mobility options for three types of disadvantaged populations within six specified California areas to provide needed charging infrastructure." EBCE respectfully requests that the CEC provide more detail on the three types of disadvantaged populations that would be eligible. We also ask the CEC to please confirm the six specified California areas.

Chapter 4: Zero-Emission Vehicles and Infrastructure – Medium- and Heavy-Duty Zero-Emission Vehicles and Infrastructure (p. 42)

The Report notes that five medium- and heavy-duty concepts will be developed into solicitations. One of these five concepts is hydrogen rail and marine applications. EBCE encourages the CEC to include electric marine/on-water applications in this funding as well. There are already plug-in hybrid electric on-water vessels, such as plug-in ferries, and more will be coming into the market in the upcoming years. In addition to funding for the electric vessels, funding will also be critical to support the necessary charging infrastructure and shore power.

EBCE also supports funding being provided for innovative charging stations for on-road medium- and heavy-duty vehicles. We recommend the CEC allocate funding for infrastructure and grid-responsive technologies, like battery energy storage, specifically for this customer segment. This will enhance project economics for fleet managers while increasing community resilience and ensuring business continuity in time of grid outage.

Chapter 4: Zero-Emission Vehicles and Infrastructure – Charging for Medium- and Heavy-Duty Vehicles (p. 43-44)

The Report states that, “CEC staff is developing a set of guidelines specific to medium- and heavy-duty vehicles and expects that a portion of the funding from this allocation may be used to support the installment of charging infrastructure specifically for medium- and heavy-duty PEVs.” EBCE now serves fifteen member communities in Alameda and San Joaquin counties. Our customer accounts include the commercial and industrial sectors, which operate medium- and heavy-duty vehicles throughout their supply chain. EBCE also serves a number of major customer accounts at the Port of Oakland, which is one of the busiest container ports in the U.S. Millions of tons of freight moves through Alameda County annually to regional, state and national markets. As a result, Alameda and San Joaquin counties have some of the highest volumes of goods movement traffic in California due to designated freight corridors including I-5, I-80, I-580, and I-880.

Communities neighboring these corridors are exposed to higher levels of criteria air pollutants and have increased incidences of health impacts compared to those in other parts of the Bay Area, California, and U.S. (statistics can be provided if needed). Many of these communities are designated as low-income and/or disadvantaged communities.

To concurrently address health disparities while reducing greenhouse gas emissions from the goods movement sector, EBCE is prioritizing efforts to launch medium- and heavy-duty EV pilot projects throughout our service area. We strongly encourage the CEC to allow a significant portion of this funding be used to support the deployment of charging infrastructure for this customer segment. Installing charging infrastructure for medium- and heavy-duty vehicles can have exponentially higher costs due to the amount of power needed at a site. While providing funding for vehicles is extremely helpful, that alone will not allow many of the smaller and mid-sized companies operating these fleets to electrify. And as previously noted, in EBCE's service area many of the facilities where charging infrastructure is needed are also located in disadvantaged and low-income communities where it is a priority to deploy projects that decrease air pollution.

The Report also discusses the development of the HEVI-Pro tool, which will provide a framework for potential grid upgrades necessary to enable electrification of medium- and heavy-duty fleets. EBCE respectfully requests that the CEC provide details on the level of engagement staff has had, and plans to have, with the investor owned utilities, publicly owned utilities and community choice aggregators on this effort.

Finally, the Report notes that CEC staff are exploring the option of developing an incentive project for medium- and heavy-duty charging infrastructure that could be similar to CALeVIP. EBCE strongly supports the CEC allocating funding and developing a dedicated incentive program for this use case. EBCE is willing and able to be involved in this process if the CEC is seeking stakeholder engagement, and feedback on this topic.

Chapter 5: Alternative Fuel Production and Supply – Fuel Type Overview (p. 52-54)

EBCE strongly encourages the CEC to include electricity (and more notably, renewable electricity) in the low-carbon fuel production funding. EBCE is the first load serving entity to have a 100% renewable electricity product as a certified pathway in CARB's Low Carbon Fuel Standard credit system. We support the idea that projects producing renewable electricity used as a transportation fuel should be included in this funding stream. Additionally, the Report states that, "Potential renewable hydrogen production projects may include using renewable energy to produce large volumes of renewable hydrogen through electrolysis..." EBCE is very supportive of including these projects in this funding stream.