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Docket Number:	19-ALT-01
Project Title:	2020-2021 Investment Plan Update for the Clean Transportation Program
TN #:	232647
Document Title:	Earthjustice Comments - 2020-2023 Investment Plan Update for the Clean Transportation Program (CEC-600-2020-001-SD)
Description:	N/A
Filer:	System
Organization:	Earthjustice
Submitter Role:	Public
Submission Date:	4/2/2020 4:01:35 PM
Docketed Date:	4/2/2020

*Comment Received From: Earthjustice
Submitted On: 4/2/2020
Docket Number: 19-ALT-01*

2020-2023 Investment Plan Update for the Clean Transportation Program (CEC-600-2020-001-SD)

Additional submitted attachment is included below.



April 2, 2020

Commissioner Monahan
California Energy Commission
1516 Ninth Street
Sacramento, CA 95814

Re: 2020-2023 Investment Plan Update for the Clean Transportation Program (CEC-600-2020-001-SD)

Dear Commissioner Monahan:

On behalf of the undersigned health, community, environmental and labor groups, we file comments on the 2020-2023 Investment Plan Update for the Clean Transportation Program. Our transportation systems impose immense harms on communities throughout California. In addition to the localized harms from a transportation system primarily run on burning fossil fuels, the system imposes regional pollution in the form of being the largest contributor to the notorious blankets of smog that cover many parts of our state. In addition, to meet our ambitious greenhouse gas targets, we must dramatically reduce emissions from the transportation sector. The California Energy Commission (CEC) plays a significant role in investing in solutions to our transportation pollution problems. As such, we encourage a long-term commitment from the CEC towards zero-emissions and strong workforce development to achieve this zero-emissions future.

I. We Support Investments in Charging Infrastructure for Passenger Vehicle Electrification.

We support the investments in advancing charging for electric cars and small trucks. We encourage the CEC to continue to prioritize charging in areas that benefit disadvantaged communities. These investments are desperately needed to build a charging network sufficiently robust to support a large increase in electric cars and small trucks.

II. A Focus on Supporting the Transition to Zero Emissions In the Medium- and Heavy-Duty Sectors Is Appropriate.

For years, our organizations have advocated shifting substantial resources to zero-emissions vehicles and associated infrastructure. We appreciate the draft plan’s recognition that “[t]he mass adoption of zero-emission vehicles (ZEVs), including plug-in electric vehicles (PEVs) and fuel cell electric vehicles (FCEVs), is critical to California’s decarbonization goals, in addition to its air quality standards and petroleum reduction goals.”¹ We also appreciate the recognition in the plan that significant air and climate pollution goals can be obtained by targeting medium- and heavy-duty sectors. We think the investment plan strikes the right balance of steadily increasing investments in zero-emissions in the medium and heavy-duty sectors between FY 2020-21 to FY 2022-23. We continue to encourage a heavy focus on providing resources to charging that benefits disadvantaged communities.

In addition to focusing on traditional places to advance zero-emissions (i.e., seaports and warehouses), we encourage the CEC to explore facilities like railyards, which impose immense health risks to disadvantaged communities in many parts of California. Moreover, the Commission needs to support efforts to add larger numbers of electric vehicles into fleets (i.e., 50-100 vehicles) powered by clean energy. The Commission is already exploring this type of funding for the transit sector, and we believe trucking fleets and other freight fleets should have a similar type of program in the coming years as more electric trucks come to California. There is important information about operations and charging that can be obtained by supporting larger scale deployments in the near term.

III. We Discourage Continued Investments in Alternative Fuel Production Supplies.

We remain concerned about the efficacy of some investments in alternative fuel production. We especially discourage continued investments into biomethane. In particular, the Plan notes that “biomethane needs to be prioritized for specific transportation applications (as well as other purposes) in which no zero-emission alternative is available.”² Our experience has been that the promotion of biomethane in the transportation sector has not displaced existing natural gas use, but rather has led to the expansion of natural gas use in the transportation sector. These funds could be better deployed on zero-emissions transportation projects in communities where alternative fuel production would traditionally take place (i.e., the San Joaquin Valley). To the extent the Commission continues to invest in this area, we encourage the \$10 million to go towards renewable hydrogen production, instead of biomethane or alternatives to diesel. This would be more in line with the ultimate goal of a zero-emissions transportation system.

¹ Brecht, Patrick. 2020. 2020-2023 Investment Plan Update for the Clean Transportation Program. at p. 34. California Energy Commission. Publication Number: CEC-600-2020-001-SD

² *Id.* at 54.

IV. The CEC Should Lead Efforts to Understand Cheaper Ways to Deploy Electric School Buses.

The Report includes powerful statistics about how much it would take to fund the remaining 1,330 electric school buses that met application requirements for the most recent CEC school bus solicitation, but were not funded.³ It is our understanding that funding will become increasingly harder to find in the coming years as we recover from the COVID-19 pandemic. We encourage the CEC to work with other California agencies to determine other, more cost effective ways to fund the conversion of school buses to electric models. For example, other states have used strategies involving utility ownership of batteries and other investment models for advancing electric school buses.⁴ We appreciate the CEC's continued leadership in advancing zero-emission school buses, but we want to make sure any dollar expended on electrification of school buses and associated charging infrastructure is stretched to the maximum.

V. Increased Investments in Workforce Development Are Critical To Advance Our Ability to Deploy Electric Vehicles.

Recent reports have confirmed that electric vehicles play an increasingly important role in California's economy. For example, a recent report by the Los Angeles Economic Development Corporation determined that the electric vehicle industry represents 1.6% of statewide employment. In fact, while the overall job rate in California increased by 1.9% between 2010 and 2018, jobs in the electric vehicle sectors increased at 2.8%.⁵ Also, the jobs paid more than jobs in other sectors. Given that California is poised to continue to be a major center for jobs associated with the electric vehicle industry, increasing investments in workforce development is critical to advance our ability to deploy electric vehicles. We recommend doubling the workforce development funding in this plan.

Likewise, it is critical for the CEC to support strong workforce development policies in its electric vehicle procurement contracts. Specifically, we recommend that the CEC consider the following criteria in evaluating electric vehicle manufacturer contracts going forward: the electric vehicle manufacturer's number of core workforce employees with direct, year-round employment of at least 35 hours per week; the manufacturer's employees' wage levels are competitive with the industry; the manufacturer maintains easily accessible, relevant, and enforceable policies for paid leave, scheduling, and grievance process; the manufacturer provides competitive benefits to employees, including affordable employer-supported medical insurance and paid time-off per year; the manufacturer conducts performance reviews, training, and

³ *Id.* at 63.

⁴ See e.g., Dominion Energy, *Electric School Buses*, available at

<https://www.dominionenergy.com/ourpromise/innovation/electric-school-buses>.

⁵ Los Angeles Economic Development Corporation, *Energizing an Ecosystem: The Electric Mobility Revolution in Southern California*, at p. 36 available at

<https://laedc.org/2020/03/01/laedc-ev-industry-report/>.

upward mobility opportunities are provided to employees on an appropriate schedule; and the manufacturer has scheduling practices that ensure predictable schedules and compensation for schedule changes.

Finally, we encourage the CEC to address the issues raised by the California State Labor Management Cooperation Committee for the International Brotherhood of Electrical Workers and the National Electrical Contractors Association in their letter dated March 30, 2020. We appreciate your consideration of this feedback, and please do not hesitate to contact us if questions arise.

Sincerely,

A handwritten signature in black ink that reads "Adrian L. Martinez". The signature is written in a cursive style with a long horizontal stroke at the end.

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Earthjustice

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