

DOCKETED

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Comments on Medium- and Heavy-Duty ZEV Infrastructure Funding Allocation Workshop Presentation

Please find attached a comment letter from the Los Angeles County Electric Truck & Bus Coalition regarding the Medium- and Heavy-Duty ZEV Infrastructure Funding Allocation Workshop. We look forward to working with the Commission to incorporate these suggestions.

Sincerely,
Yasmine Agelidis
Los Angeles County Electric Truck & Bus Coalition

Additional submitted attachment is included below.



March 18, 2022

California Energy Commission
715 P Street
Sacramento, CA 95814

Re: Medium- and Heavy-Duty ZEV Infrastructure Funding Allocation Workshop Presentation

Dear Commission Staff:

The Los Angeles County Electric Truck and Bus Coalition works to advance the adoption of zero-emission buses, trucks and other vehicles over polluting fossil fuel vehicles, while also ensuring that the communities of color that have long suffered the brunt of environmental racism receive the benefits of clean technology first. We are supportive of the Energy Commission's large-scale investments in medium and heavy-duty electrification, which deliver immediate emissions benefits to residents in our region's most polluted and disadvantaged communities, while California's expanding zero-emissions manufacturing and infrastructure industries train and employ disadvantaged workers in family-sustaining jobs.

On behalf of the Los Angeles County Electric Truck and Bus Coalition, we write regarding feedback and recommendations on program and funding prioritization for \$390 million in FY 2022-23, as outlined at your February 28, 2022 workshop. Overall, we are excited to see the Energy Commission continue to invest in a balanced mix of innovation, planning, and implementation support for zero-emission transportation. Given the scale of the need, and the necessarily limited public funding, we urge the agency to focus on high-impact, large-scale projects in the public sector, with scoring criteria and transparency that elevate economic and environmental justice.

I. The Commission's School District Vehicle Grid Integration (VGI) Program Should Prioritize Funding Large School Districts With High Pollution Burdens and Disadvantaged Communities.

This Energy Commission program is just one part of this state's historic investment in school bus electrification, which includes \$430 million over three years to electrify 1,000 school buses, as well as budget proposals for an additional \$1.5 billion for another 5,000 buses. While it is important to focus on specific program metrics for the 2022-23 infrastructure allocation, our Coalition urges the agency to zoom out to the key goals of all interrelated school bus funding, to make sure all VGI funding programs are aligned with the statewide priorities. As the Energy Commission and its sister agencies move forward with numerous school bus funding programs over the next several years, it is absolutely critical that all funding decisions account for equitable distribution by population, poverty, and pollution. Specifically, we would like the Commission's School District VGI program to prioritize funding large school districts in nonattainment areas with significant disadvantaged populations.

First, we would like to see large school districts in California receive a proportional amount of the Energy Commission's available funding. Many current and planned funding programs have applicant or district-specific caps on buses that limit meaningful turnover to zero-emissions buses. This specifically disadvantages large urban districts with the largest numbers of buses and, oftentimes, the largest populations of environmentally and economically disadvantaged

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children. For example, the Los Angeles Unified School District is the second largest district in the nation, with a fleet of 1,300 school buses that serve a population of over 500,000 students, of whom 88% are BIPOC and reside in high pollution-burdened communities. Any funding program that does not prioritize distribution of funding to LAUSD and similarly highly-burdened districts is not achieving baseline equity principles.

In past Energy Commission programs, all districts were able to apply for up to 10 electric buses. Although this allocation may be considered equal, its impact was not proportionally equitable for students in larger, high-poverty, heavily polluted districts. If large districts are only able to deploy 50 electric school buses after multiple rounds of significant grant funding, our state will have failed these students. We urge the Energy Commission to allocate school bus VGI funding based on an equitable distribution by population, poverty, and pollution.

Second, with respect to the specific VGI allocations at stake in this funding plan, V2G energy resilience projects must support the full spectrum of grid challenges, acknowledging the heat burden faced in high-poverty urban areas with unreliable summer grids, where communities are dependent on regional cooling centers for basic safety. In addition to public safety power shutoffs and fire danger, urban regions face operational capacity constraints during peak energy summer months. All of these situations have dire public safety impacts, including serious adverse health impacts during heat waves.

Moreover, to ensure that public funding actually achieves the highest public benefit when flowing to private EVSPs, the Energy Commission must require EVSPs to prioritize projects in school districts and areas where there is the highest need, based on pollution, poverty, and population. Without strict equity guardrails, there remains the very real risk that EVSPs will prioritize VGI projects based only on private industry's internal metrics and calculations, and will not take equity into consideration. Similarly, it is very important that the Commission include strict jobs parameters that will lead to good, high-road jobs in California. The VGI effort in California is intended to lead to turnkey solutions for other school bus operators, making this inclusion all the more important. As such, any grants to private entities must include strict parameters around jobs, including:

- Maximizing access to new high-road jobs for Californians
- Scoring criteria, reporting transparency, and enforcement to ensure project job benefits flow to disadvantaged and low-income communities, including information on wage rates, disadvantaged worker representation for each job category, and stronger recruitment and training plans.

The inclusion of local job quality and benefits to disadvantaged communities in the scoring criteria presents a tremendous opportunity to spur greater adoption of clean bus technology while also stimulating the growing California manufacturing hub for zero-emission vehicles.

II. The Commission Should Prioritize MD/HD Blueprint Planning and Technical Support Funding for Public Fleets Embarking on a Holistic Rollout Plan.

We are very pleased to see that the Commission is prioritizing funding for Medium- and Heavy-Duty Blueprint Planning. The MD/HD Blueprint funding program is a critical planning tool for agencies across California, and will only become more important in the coming years as public fleets continue to embark on large-scale electrification. Until now, the program has been a jump-start tool for forward-thinking fleets working to incorporate sustainability. With California's recent

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commitment to a rapid zero-emission transition, all public agencies and utilities need a holistic and coordinated rollout plan across their fleets and facilities that can maximize operational and cost savings over the long-term, and the Commission's Blueprint Planning grant offers this support.

There are several key priorities we would like to see reflected in how the Commission distributes these critical Blueprint funds. First, given the budgetary challenges faced by public entities, the Commission should ensure that public agencies are first in line to receive Blueprint grants. Second, because larger fleets are the most complex to electrify, public entities that are transitioning large fleets should receive priority as well. Third, public agencies in the most highly-polluted regions in our State should also receive priority for this Blueprint funding. This will support the need to clean the air for our communities with the highest pollution burden first. We ask that the Energy Commission incorporate each of these prioritizations into the Blueprint Planning, and believe that this will not only serve our shared equity goals, but will also allow larger entities to parse through some of the more challenging fleet electrification issues, which smaller entities can then learn from.

In addition, our coalition asks that the Energy Commission create a separate funding pot to support public agencies that need initial planning, engineering, and procurement assistance in developing their fleet-wide zero-emission plans. We think it will be important for there to be a flexible, targeted pot of funds available throughout the year that agencies can tap into to both help with project initiation and as-needed implementation. California is rapidly building expertise in zero-emission project development and implementation, yet this experience resides largely in the private sector. The ability to request targeted support from the Energy Commission would help speed and smooth project development timelines for public agencies.

In summary, our Coalition applauds the Energy Commission for its Clean Transportation Program, which has funded over \$1 billion in groundbreaking and transformative energy projects. These efforts helped enable California to lead the nation towards a zero-emission M/HD future. As we plan for this next stage of mass adoption and implementation, it is clear that all funding should align with equity priorities around pollution, population, and economic metrics, including school bus and planning dollars that flow to localities throughout California.

Sincerely,

Yasmine Agelidis
Associate Attorney, Earthjustice

On behalf of the Los Angeles County Electric Truck and Bus Coalition

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