

DOCKETED

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City of Sacramento Comments on the Draft Zero-Emission Vehicle Infrastructure Plan

Please refer to attached comment letter.

Additional submitted attachment is included below.

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May 13, 2022

Submitted Electronically

California Energy Commission
Docket Log (21-TRAN-03)
1516 Ninth Street
Sacramento, CA 95814-5512

Subject: City of Sacramento Comments on the Draft Zero-Emission Vehicle Infrastructure Plan (ZIP)

Dear Energy Commission staff,

We applaud the State's leadership for the acceleration of zero-emission vehicle (ZEV) adoption. To maximize the impact of the ZIP and future CEC investments, we strongly urge you to consider the unique needs of local public agency fleets. Programs like CALeVIP were an important start, but direct, targeted funding for public fleet infrastructure is notably absent from the state's current programs. **Advancing direct formula funding to public fleets can accelerate turn-key electrification that will significantly improve the air quality of our most disadvantaged neighborhoods.**

Our comments build on our leadership in ZEV adoption and innovation. Examples include:

- Our support for community chargers through efforts like the CEC EV Blueprint Phase 1 and Phase 2 funding;
- The Sac-to-Zero partnership for zero-emission car share and charging infrastructure with Electrify America;
- Partnership with EVgo for curbside fast charging;
- Our use of CALeVIP to install 103 new and replaced networked EV chargers across eight City facilities (99 of which are publicly available), maxing out electrical capacity for charging across City-owned sites; and
- Our adoption of a local EV Infrastructure Charging Ordinance, and our leadership as one of the most streamlined agencies for permitting EVSE, as recognized by GO-Biz.

However, **our ability to further accelerate the electrification of our own fleet is constrained.** We need forward-thinking investment for longer-term infrastructure upgrades to support fleet conversions over time.

We are committed to fleet electrification, with a “ZEV-first” pledge and 115 ZEVs in our City fleet. We plan to electrify 250 more vehicles over the next five years. However, the biggest remaining barrier to our ZEV advancement is the absence of dedicated funding for public fleet charging infrastructure.

We urge you to address the **unique charging needs of public fleets in the ZIP, which are notably absent from the ZIP.**

Local agencies are critical partners for the rapid electrification of California’s vehicle fleet. While our agencies typically have existing funding mechanisms to support vehicle replacement, **our traditional local agency budgeting processes are not structured to cover the large upfront costs that will be necessary for the long-term expansion of electrical capacity and charging infrastructure.** However, we know this large upfront investment is necessary for our fleets to fully convert to zero-emission.

Agencies like ours require greater state support to cover upfront ZEV infrastructure investments. Such a coordinated approach could also ensure successful compliance of public agencies with the proposed Advanced Clean Fleets Regulation.

We strongly advocate for direct, formula funding to local public fleets that are committed to electrification. Please find additional detail and context below, based on the issues and opportunities identified in the ZIP.

I. Reliability of charging and infrastructure networks:

In addition to the issues identified in the ZIP, the CEC should also address the reliability of infrastructure for the unique needs of agencies providing critical services. As a full-service municipality with a fleet of more than 2,000 vehicles, conversion of our fleet requires investment in fleet-only chargers at dedicated corporation yards to ensure the continuity of critical services. This practice is necessary for the good stewardship of public taxpayer and ratepayer dollars; shared public infrastructure where City employees must wait their turn while “on the clock” for delivering critical City services is unacceptable and could compromise public health and safety. Hence, **to support the reliability of public services in light of intensifying climate impacts and extreme events**, the CEC should **increase funding to local agency fleets for ZEV infrastructure**, which may involve investment in infrastructure placed in corporation yards with restricted access to our fleets and services.

II. Equity in every decision:

Recognizing that large public fleets like ours greatly impact the air quality of historically under resourced neighborhoods, **direct investment in fleet infrastructure ensures significant and rapid fleet conversion that benefit DACs.** According to CalEnviroScreen 4.0, nearly one quarter of Sacramento’s 2010 population lived in one of California’s most “disadvantaged” communities, including multiple census tracts ranked in the top 10% statewide for asthma and cardiovascular disease burdens. Importantly, even with massive state investments, many of our low-income communities are unable to quickly transition to ZEVs. Hence, to ensure that these neighborhoods benefit from ZEV technologies, the state can facilitate the rapid electrification of public fleets to deliver air quality benefits.

III. Level 1 and Level 2 Charging for Light-Duty PEVs:

Although the ZIP proposes weighting more investment to MD/HD ZEV infrastructure, **we strongly urge the CEC to not leave light-duty public fleet charging needs behind.** Building comfort with the light-duty fleet is a critical step before we can confidently transition our medium- and heavy-duty operators to ZEVs. Providing adequate light-duty charging infrastructure is critical, and until these needs are met, electrification of our medium- and heavy-duty fleet will be delayed. For example, when accounting for the public fleets of Sacramento County and all incorporated cities within, we have a combined public

fleet of more than 5,600 vehicles. To date, less than 200 of these are electrified, a mere 3% of our collective public fleets in Sacramento County, supported by less than 30 fleet-only chargers.

III. Other Issues:

When considering light-duty vehicle chargers, please note the following as considering related ZIP issues:

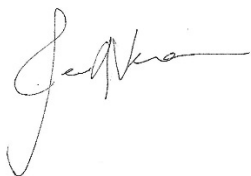
- **Fast charging for light-duty plug-in EVs:** We agree that fast charging is important to support range confidence and ensure continuity of services for critical local agency operations. However, we strongly emphasize the importance of funding for fast chargers serving public fleets, which are public-serving and public-benefitting, even when only available to fleet vehicles.
- **Challenges with competitive grants:** Competitive grant programs alone are insufficient to enable our fleet transition. Competitive grants are challenging to secure and unpredictable, making it infeasible for local agencies to plan, prepare, and set aside necessary match funding to compete for new sources. Furthermore, local agencies typically operate on a fiscal year schedule, which poses challenges to mobilizing resources for rapidly emerging programs on tight timelines.
- **Infrastructure serving public fleets should be treated as public:** Chargers supporting public fleets should be eligible for funding that targets “public” charging, regardless of whether the charger is available directly to members of the public. Again, our fleets are paid for with taxpayer and ratepayer dollars, and deliver critical public services to the community, including the nearly 100,000 employees of the State of California in Sacramento city limits, and all associated state buildings. Examples of critical services we provide include police, fire, water utilities, emergency response, and more. Our fleets are an important component of the state’s continued public investment.

To conclude, **we encourage you to prioritize direct, turnkey formula grants and direct funding to local public agency fleets.** Such an approach can help ensure that the ZIP and future investment plans do not leave public fleets behind. Underfunding of public fleets will miss a key opportunity to deliver rapid ZEV adoption and air quality benefits to many of the most disadvantaged neighborhoods in the state.

Further, **ignoring the needs of public fleets may undercut the efficacy of closely related efforts at sister state agencies,** most notably the forthcoming public fleet rules in the Advanced Clean Fleets Regulation being advanced by the Air Resources Board.

Thank you for consideration of our comments. Please contact me (jvenema@cityofsacramento.org or 916-808-1859) if the team would like any additional information.

Best regards,



Jennifer Venema
Climate Action Lead