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*Comment Received From: Gladstein Neandross and Associates  
Submitted On: 10/19/2022  
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**GNA ZIP Comment Letter**

*Additional submitted attachment is included below.*

October 19, 2022

Drew Bohan, Executive Director  
California Energy Commission  
715 P Street  
Sacramento, CA 95814

**Re: Comments on the Draft Zero-Emission Vehicle Infrastructure Plan (ZIP) (CEC-600-2022-054)**

Dear Mr. Bohan,

On behalf of Gladstein Neandross & Associates (GNA), we thank you for the opportunity to submit comments on the draft Zero-Emission Vehicle Infrastructure Plan (ZIP). For the past twenty-nine (29) years, GNA has successfully developed and implemented projects on behalf of our clients that reduce emissions and fuel costs, improve air pollution, and secure funding for alternative fuel, advanced vehicles, and fueling/charging infrastructure deployments. We have secured over \$1 billion in funding to assist the transition of fleets to zero-emission vehicles (ZEV). Our clients come from varying backgrounds and industries such as the public sector (Port of Los Angeles; California Air Resource Board; Los Angeles County Internal Services Department), vehicle and equipment operators (Albertsons; Penske Truck Leasing Co.; CR&R Waste and Recycling), and fuel suppliers (EV Connect; Southern California Edison; WattEV). We are excited by the current positive energy towards realizing a cleaner future.

We respectfully submit the below comments indicating areas of improvement for the draft ZIP that we believe will maximize its impact:

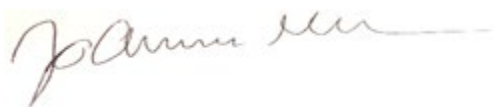
1. **California Energy Commission (CEC) should look to support innovation and creative solutions to achieve resilient grids that are able to independently support the charging of critical EV fleets.** As California continues to quicken its transition to vehicle electrification, we recommend that the CEC support innovative solutions to provide power resiliency to critical fleets such as emergency services, public transit, and certain goods movement facilities. With California's residents and businesses becoming more dependent on EVs for vital services, it is critical that utilities pursue strategies that create this needed resiliency while maximizing the use of resiliency assets (like energy storage) to improve grid efficiency during non-emergency events. Without such solutions, the adoption of EVs in many of these sectors will be limited or require expensive, underutilized, or fossil-based backup generation systems that will work counter to the State's goals.
2. **California should consider the inclusion of language regarding the maintenance of hydrogen infrastructure when discussing the building of a reliable charging and fueling network for hydrogen vehicles.** As the State seeks to expand its existing infrastructure into a fully reliable charging and fueling network, we would like to raise that the maintenance of hydrogen fueling systems be made a priority. According to the California Full Cell Partnership, as of June 30, 2022, there are currently fifty-six (56) operational hydrogen fueling stations (HFS) in California. This number will quickly increase as an additional one hundred and eighteen (118) HFS (over 200% increase from the current amount) are currently in development. We are at a stage of exponential growth for hydrogen as an alternative fuel source and it is critical that we ensure existing stations and those in development are well maintained to secure the network's reliability. This will help avoid situations where stations are inoperable and need to be dismantled due to lack of maintenance, requiring removal at the cost of local municipalities. Such action will be critical to boost confidence in hydrogen vehicles among consumers, original equipment manufacturers (OEM), and local municipalities.

3. **ZIP should look to proactively support zero-emission vehicle (ZEV) infrastructure generation and storage technologies to reduce energy costs and encourage the transition to renewable energy.** We suggest that the CEC add language to ZIP regarding proactively supporting the inclusion of energy generation and storage technologies to support ZEV infrastructure. By incorporating energy generation and storage technologies, sites will be able to reduce their energy costs which are then able to provide more affordable rates for consumers. Having charging sites both generate and store their energy; these locations will have increased resiliency to operate during periods when the energy grid is down. Support for these technologies will also allow sites to come online at a faster rate thereby increasing the rate at which California's charging network is being built out.
4. **California should continue to partner with local municipalities to provide greater access to charging infrastructure in underserved communities and populations.** Los Angeles is home to more than fifty percent (50%) of the state's disadvantaged communities (DACs) at or exceeding the twenty-fifth percentile (25%) per CalEnviroScreen 4.0. Through statewide programs such as the Reliable, Equitable, and Accessible Charging for multi-family Housing (REACH), the CEC has successfully been able to implement programs that directly impact underserved communities. To ensure that the state's disadvantaged communities are aware and able to participate in such funding programs, we recommend further coordination with local municipalities to conduct outreach with community-based organizations (CBOs) to ensure that interested members of the community can successfully utilize available incentive programs.
  - a. In the lead up to incentive programs targeting underserved communities, we recommend that the CEC partner with local municipalities to inform CBOs, key stakeholders, and community members.
5. **California should look to partner with industry stakeholders, educational institutions, and municipalities to help build out the necessary workforce needed to ensure the expanding network of charging and fueling stations is adequately maintained.** GNA recommends that the CEC includes language regarding coordinating with industry stakeholders, educational institutions, and municipalities to develop the workforce needed to maintain the ever-growing charging and refueling station network throughout the state. Electric vehicle supply equipment (EVSE) has greatly benefited from technical partnerships as seen in the creation of the Electric Vehicle Infrastructure Training Program (EVITP) which saw stakeholders across several industries, including EVSE manufacturing, create a training program that taught electricians the skills necessary for installing and maintaining EVSE. EVITP is now a requirement for many of the CEC's incentive programs such as EnergiIZE.
  - a. Several community colleges and technical schools throughout California offer students the opportunity to earn their California Electrician Certification. The CEC and other state agencies can look to partner with these institutions by offering the EVITP training to provide interested students with the knowledge and technical skills they need to succeed in the industry.
  - b. In coordination with local municipalities, state agencies can communicate with Local 11s to provide education and training opportunities for EVSE installation and maintenance with their membership.
6. **California should maintain a balanced approach of creating and expanding the necessary infrastructure for all vehicle types (light-, medium-, and heavy-duty) when distributing funds.** We appreciate ZIP having a balanced focus on the need for EVSE for MDHD charging infrastructure along with light-duty vehicles. For California to meet its ZEV targets stated in Executive Order N-79-20, it is important that the appropriate infrastructure be provided for each vehicle type prior to the corresponding target year to achieve 100% ZEVs.

We are supportive of the State's plan to expand funding to accelerate the deployment of ZEV charging infrastructure, and we are hopeful that these impacts will be felt in the County. Please do not hesitate to reach out to GNA's Senior Vice President of Programs, JoAnne Golden ([joanne.golden@gladstein.org](mailto:joanne.golden@gladstein.org)) as you move throughout this process.

Thank you in advance for your consideration, and we look forward to continuing to engage with you throughout the development of ZIP.

Sincerely,

A handwritten signature in black ink, appearing to read "JoAnne Golden", with a long horizontal flourish extending to the right.

JoAnne Golden  
Senior Vice President, Programs  
Gladstein Neandross & Associates  
[joanne.golden@gladstein.org](mailto:joanne.golden@gladstein.org)