

**DOCKETED**

<b>Docket Number:</b>	23-ALT-01
<b>Project Title:</b>	2023-2024 Investment Plan Update for the Clean Transportation Program
<b>TN #:</b>	250104
<b>Document Title:</b>	Electric Transportation Community Development Corporation Comments - Support for Draft Staff Report 2023-2024 Investment Plan
<b>Description:</b>	N/A
<b>Filer:</b>	System
<b>Organization:</b>	Electric Transportation Community Development Corporation
<b>Submitter Role:</b>	Public
<b>Submission Date:</b>	5/11/2023 1:29:27 PM
<b>Docketed Date:</b>	5/11/2023

*Comment Received From: Electric Transportation Community Development Corporation*  
*Submitted On: 5/11/2023*  
*Docket Number: 23-ALT-01*

## **Support for Draft Staff Report 2023-2024 Investment Plan**

*Additional submitted attachment is included below.*



May 11, 2023

California Energy Commission

Re: Docket No. 23-ALT-01

*Submitted via electronic commenting system for docket 23-ALT-01*

**Re: Draft Staff Report: 2023-2024 Investment Plan Update for the Clean Transportation Program**

The Electric Transportation Community Development Corporation (ETcommunity) appreciates the opportunity to provide comments in support of the Draft Staff Report 2023-2024 Investment Plan Update for the Clean Transportation Program (Plan). ETcommunity is a 501(c)(3) non-profit organization that promotes a reliable and equitable transition of transportation, jobs, and other environmental benefits of electric transportation through outreach and education in communities most impacted by air pollution and economic disparity. ETcommunity's Executive Director (Advisory Committee member Eileen Tutt) provided some verbal feedback for the Investment Plan on April 27, 2023. This letter is intended to largely support the direction the Draft Staff Report establishes, as well as to provide additional feedback for consideration by Lead Commissioner Monahan and CEC staff.

California's vehicle regulations require all vehicles to be zero emission, e.g. new cars by 2035, drayage trucks by 2035, and sleeper cab trucks by 2042. The [CEC's AB 2127 report](#) and [SB 1000 reporting requirements](#) both call for accelerated deployment of charging infrastructure and indicate that while progress has been made, much more will be needed, particularly in communities of color, low-income, and/or disadvantaged communities, to adequately, reliably and affordably fuel electric cars and trucks on the road today and anticipated in the next decade. The April 27 workshop staff presentation, slide 17, as well as other independent analyses show that California has a long way to go to meet the charging needs for light-duty electric vehicles, in addition to meeting the growing charging needs for medium- and heavy-duty vehicles.

Overall, the Clean Transportation Program has been a tremendous success and it is essential that the program be reauthorized and continue beyond this 2023/24 fiscal year. Given zero-emission cars and trucks are just starting to reach priority communities, the investments must continue, particularly in these communities, to ensure equitable access to zero-emission vehicles, affordable charging infrastructure, and the workforce, jobs and economic benefits associated with the transition to zero-emission vehicles. ETcommunity urges the CEC, Administration, and Legislature ensure this valuable program is reauthorized and continues to focus investments to benefit priority communities.

Although reauthorization of the Clean Transportation Funding is essential, ETcommunity is concerned that hydrogen will again receive a carve-out for funding and future Clean Transportation Program Plans will not allow the public investments to prioritize equity. ETcommunity supports all zero-emission vehicle and fuel options, however hydrogen fuel cell vehicles and hydrogen fuel are not affordable for many Californians

and should be prioritized only if they specifically benefit priority communities. That is, although hydrogen appears to be an attractive zero-emission car and truck option, any carve outs or priorities associated with the Clean Transportation Program or public investment should be for priority communities and not for hydrogen or any other specific fuel type.

ETcommunity supports the Plan's investments in light-duty charging infrastructure, including those focused on shared access, multi-unit dwellings, e-mobility, and other equity-related investments that act to expand EV access to all Californians. The Plan itself and many other assessments demonstrate clearly that California is not on track supporting existing light-duty electric vehicles nor is California on track for meeting the mid- to long-term need. This is particularly true in priority, tribal, and rural communities. Many priority communities lack access to home charging in multi-unit dwellings, or access to affordable charging infrastructure nearby. In many priority, rural and/or tribal communities, electricity grid upgrades may be needed, and public funding is essential to bring the needed affordable charging options to these communities. It should be noted that light-duty investments in both infrastructure and vehicles facilitate the needed investments in medium- and heavy-duty vehicles and infrastructure, through technology transfer. There is no inherent choice between light-duty and medium- and heavy-duty charging infrastructure investments – both are necessary to ensure an equitable transition to a zero-emission transportation future.

ETcommunity supports the investments in ZEV manufacturing and workforce training and development that ensure the jobs, workforce and economic benefits of the transition to zero-emission transportation reach all Californians. Previous Clean Transportation Program investments in ZEV manufacturing have been essential to creating and retaining good jobs in the industry, and more is needed, particularly focused on benefiting priority communities. We do not comment at this time on whether the recommended investment is adequate, but we are committed to working with the Lead Commissioner, CEC staff, and other Advisory Committee members to better understand the need and ensure it is adequate to overcome the inherent inequities in jobs creation that have existed since the country was formed and will require investment and intention to overcome.

Thank you for your consideration of our comments. Please do not hesitate to contact me [eileen@etcommunity.org](mailto:eileen@etcommunity.org) should you have any questions.

Sincerely,



Eileen Wenger Tutt, Executive Director  
Electric Transportation Community Development Corporation