

DOCKETED

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**Joint Transportation Electrification Stakeholder Comments on
Investment Plan Update**

Additional submitted attachment is included below.



May 11, 2023

California Energy Commission
715 P Street
Sacramento, CA 95814

Re: Docket No. 23-ALT-01 – Joint Transportation Electrification Stakeholders Comments on 2023-2024 Investment Plan Update for the Clean Transportation Program

Introduction

EVgo, FreeWire, Lyft, BP Pulse Fleet, Waymo LLC, and Electric Vehicle Charging Association, hereby referred to as the Joint Transportation Electrification Stakeholders (JTES), appreciate the opportunity to provide comments on the California Energy Commission's (CEC) 2023-2024 Investment Plan Update (IPU) for the Clean Transportation Program (CTP).¹ The JTES strongly supports the goals of the CTP and recognizes the fundamental role the program plays in accelerating electric vehicle (EV) charger deployment to meet state zero emission vehicle (ZEV) targets. To advance these objectives and enable the development of a broad fast charging network in California, **the JTES recommend that the CEC establish EV charging programs in the CTP that support commercial light-duty fleets.** Commercial light-duty fleets will be critical for achieving California's TE goals and the JTES seeks to be a resource as the CEC considers innovative approaches to reaching these goals.

Policy Background

State policies are driving the rapid electrification of light-duty commercial fleets. The California Air Resources Board (CARB) recently adopted the landmark Advanced Clean Fleets regulation, which will drive the electrification of an additional 40,000 light-duty vehicles and require these fleets to become fully zero-emission by no later than 2035.² CARB's Clean Miles Standard regulation also requires transportation network companies (TNCs) to rapidly decarbonize their fleets, increasing the percentage of electric vehicle miles traveled (eVMT) on their platforms to at least 90 percent by 2030.³

Together, these regulations will drive fleet electrification across all vehicle classes, including light-duty fleets, and require significant investment in charging infrastructure.

¹ <https://www.energy.ca.gov/publications/2023/2023-2024-investment-plan-update-clean-transportation-program>

² <https://ww2.arb.ca.gov/sites/default/files/barcu/board/books/2023/042723/prores23-13.pdf>

³ <https://ww2.arb.ca.gov/resources/fact-sheets/clean-miles-standard-regulation-passengers-and-communities-benefit-lower#:~:text=The%20regulation%20will%20ensure%20that,tons%20of%20greenhouse%20gas%20emissions.>

Investment Plan Funding Status

JTES appreciates the CEC's commitment to the electrification of municipal fleets in its forthcoming Municipal Fleet Solicitation and recognizes the need to support local governments' transition to EVs.⁴ However, similar program opportunities do not currently exist for light-duty commercial fleets: while the CEC's 2021 Charging Access for Reliable On-Demand Transportation Services (CARTS) solicitation supported the electrification of commercial light-duty fleets, including high-mileage on-demand transportation services,⁵ its successor program, Fast and Available Charging For All (FAST), includes new public accessibility requirements that would preclude commercial light-duty fleets from receiving the dedicated charging they need to reliably perform their duty cycles.⁶ The public accessibility requirements in FAST largely mirror the requirements included in CALeVIP 2.0.⁷

The CEC has also made sustained commitments to funding dedicated, behind-the-fence EV charging infrastructure for medium- and heavy-duty vehicle fleets through its EnergiIZE program and related initiatives.⁸ A similar commitment is needed from the CEC for commercial light-duty fleets if this sector is to grow in line with CARB's ZEV regulations.

Value of Supporting Commercial Light-Duty Fleets

While JTES supports the FAST solicitation and its role in electrifying on-demand light-duty fleets, it is important to underscore that the achievement of California's light-duty fleet TE goals and realization of associated air quality benefits will require a portfolio of charging solutions, including programs that more directly serve the needs of commercial light-duty fleet drivers and operators in line with how EnergiIZE supports infrastructure deployment for the emerging medium- and heavy-duty sector. In addition to the light-duty sector being required to scale due to the CARB regulations cited above, light-duty EVs are widely available today, with expanded options for fleet providers.

Supporting the commercial light-duty fleet sector represents a near-term opportunity to yield significant greenhouse gas emission (GHG) savings with highly utilized sites without compromising the availability of charging infrastructure for passenger vehicle drivers, as locations that are beneficial to the public – such as retail centers and grocery stores – are not necessarily optimal for light-duty fleets that need dedicated charging to fulfill their duty cycles.⁹ Unlike traditional public charging deployments that are

⁴ <https://efiling.energy.ca.gov/GetDocument.aspx?tn=248609>

⁵ <https://www.energy.ca.gov/solicitations/2021-08/gfo-21-601-charging-access-reliable-demand-transportation-services-carts> “Charging stations may be either publicly available or private. Charging should be capable of accommodating the requirements and schedules of on-demand shared or gig transportation service drivers, including sufficient hours of operation. “Publicly available” stations are those that are open to members of the general public for any period of time. “Private” stations are all other stations.”

⁶ <https://www.energy.ca.gov/solicitations/2023-04/gfo-22-611-fast-fast-and-available-charging-all-californians> “Charging stations must be publicly available. Charging stations should be capable of accommodating the requirements and schedules of on-demand transportation service drivers, including sufficient hours of operation. Reservation systems may be used, but must be made equally available to members of the public as to gig or commercial drivers.”

⁷ <https://calevip.org/incentive-project/golden-state-priority-project> “Charging station must be publicly available 24 hours per day, 365 days a year.”

⁸ <https://www.energiize.org/>

⁹ For example, TNC vehicles drive more than three times the average distance of non-commercial light-duty vehicles, meaning the GHG abatement benefit from TNC vehicle electrification is at least three times that of

often developed as an accessory use to an existing commercial property, locations that reliably serve fleet drivers may require larger footprints of dedicated commercial properties or parking lots whereby EV charging is the primary use. Real estate, permitting, and security costs for developing these sites can be materially higher on a per-charger basis than traditional public charging deployments, but are also necessary as EV adoption scales. The CEC's innovative CARTS solicitation was designed to achieve both of these goals – promoting public access and fleet charging opportunities – by funding hybrid charging hubs, but as noted above, its successor program does not support this use case.

Conclusion

Dedicated charging infrastructure for commercial light-duty fleets is one critical piece of a broader EV charging package needed to achieve the ambitious TE goals established in the Advanced Clean Fleets regulation, Clean Miles Standard, and other complementary ZEV regulations. Although the CEC previously began to address this gap in its CARTS grant, there are currently no program opportunities targeted toward supporting dedicated chargers for commercial light-duty fleets, and despite statutory goals, such funding only exists in the medium- and heavy-duty market via EnergIZE and related efforts. **For these reasons, the JTES recommends that CEC implement near-term program opportunities in the CTP that support the deployment of charging infrastructure for commercial light-duty fleets.** The JTES seeks to be a resource as the CEC considers new programs that advance the state's ZEV goals and looks forward to scaling the charging and fleet services needed to accelerate the decarbonization of California's transportation sector.

Respectfully submitted this 11th day of May,

Noah Garcia
Manager, Market Development and Public Policy
EVgo

Jon Walker
Senior Policy Manager
Lyft

Rem Dekker
Transportation Policy Manager
Waymo LLC

Renee Samson
Director of Public Policy, West
FreeWire

Heidi Sickler
Senior Director of Policy and Market
Development, West
BP Pulse Fleet

Reed Addis
Governmental Affairs
Electric Vehicle Charging Association

private vehicles. Jenn, A. (2019). Emissions Benefits of Electric Vehicles in Uber and Lyft Services. UC Davis: National Center for Sustainable Transportation. <http://dx.doi.org/10.7922/G23R0R38> Retrieved from <https://escholarship.org/uc/item/15s1h1k>