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California Energy Commission
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RE: Docket No. 20-IEPR-01

Dear Commissioners:

Thank you for the opportunity to provide feedback on Volume I of the *Draft 2020 Integrated Energy Policy Report Update*. The Los Angeles Cleantech Incubator (LACI) supports the overarching direction of the draft recommendations, particularly those focused on building out the charging infrastructure needed to scale adoption of battery electric vehicles of all classes, and the recommendations aimed at ensuring that zero emissions transportation benefits California's most impacted communities. As you finalize the Volume on Transportation, LACI offers the following insights and recommendations, building on our leadership and learnings in the Los Angeles region.

LACI is creating an inclusive green economy for the people of Los Angeles by: unlocking innovation by working with startups to accelerate the commercialization of clean technologies; transforming markets through partnerships with policymakers, innovators, and market leaders in transportation, energy and sustainable cities; and enhancing communities through workforce development, pilots, and other programs. As part of our commitment to delivering on this mission, LACI has convened the [Transportation Electrification Partnership](#), which is an unprecedented regional public-private collaboration to accelerate deep reductions in climate and air pollution by the time of the 2028 Olympic and Paralympic Games by pursuing bold targets, pilots, initiatives, and policies that are equity-driven, create quality jobs, and grow the economy.

With this work in mind, we encourage you to consider the following information and recommendations:

ZEV Workforce Opportunities

The state should prioritize funding to expand successful workforce development programs in zero emissions transportation.

As LACI recommends in our *Green Jobs in Los Angeles* study, to be released on January 29th, the state should work to increase underrepresented populations in green industries and support workforce training designed for underrepresented populations, including training programs on EV charging network maintenance.

As referenced in the draft report update (p. 53), LACI offers a [multi-tiered workforce development program](#)—in which KIGT as well as ChargerHelp! and others are service providers in LACI's training—that

provides technical training, interpersonal skills, and industry-recognized certifications to help underrepresented groups succeed in the green economy. This program is funded by the California Workforce Development Board, the California Governor's Office of Business and Economic Development (GO-Biz), the Bently Foundation, Wells Fargo, Annenberg Tech and the Los Angeles Department of Water and Power (LADWP). To date, 56 participants have completed our EV Network Technician Program and 98% of those graduates received an NFPA 70-E electrical safety certification. One of our most recent graduates received his Certified Associate in Project Management certification and, with his EV Network Technician training, he is now employed at a LACI startup, providing in field EV charging support and project management on the back end. In addition to gaining job skills in this sector, these graduates have become new, powerful advocates to their communities about the benefits of transitioning to electric vehicles.

We encourage the CEC to include a recommendation for the state to prioritize investment in training, paid internships and pre-apprenticeship and state-approved apprenticeship programs for the underemployed and unemployed, including veterans and formerly incarcerated individuals, to build EVs, install and maintain charging infrastructure, work for cleantech startups, and more.

Equity and Opportunities for Multiunit Dwellings

The state should consider deploying/scaling EV carsharing and electric bike share programs in partnership with housing authorities across the state.

We appreciate the focus in the draft report on solutions for those who reside in multiunit dwellings (p. 99). With funding from the California Workforce Development Board, LACI launched four [Zero Emissions Mobility and Community Pilots](#) in 2020 with and within disadvantaged communities in Los Angeles County. These pilots are bringing the benefits of the green economy to neighborhoods that often lack access to zero emissions mobility solutions, yet are burdened with poor air quality.

In two of the communities, we have launched EV car sharing programs and in one of the communities, we are offering electric bike rentals as well as neighborhood EV shuttles. While these pilots have only just gotten underway, one of the early successes has been with EV car sharing with Housing Authority of the City of Los Angeles where there is a clear transportation deficit for their residents, and a captive user base.

We encourage the CEC to include a recommendation for the state to fund a program that targets EV and e-bike sharing located at and dedicated to residents of local housing authorities across the state. As such, it helps ensure that the appropriate zero emissions mobility solutions are deployed to meet the unique needs of the community, and that community education and outreach is designed and implemented in the most effective ways.

Moving to Market Sustainability

The state should create the California Electric Vehicle Authority (CEVA) to enhance coordination among the many state agencies that are critical to achieving California's zero emissions transportation goals, and identify creative financing options, in order to help secure the state's recovery through equitable deployment of EV programs in the coming years—creating high quality jobs—and making California a world leader in EV deployment, design, development, manufacturing, supply chain, and infrastructure.

We agree with the draft report recommendation on “evaluating new regulatory and funding mechanisms to further encourage private sector investments in the charging infrastructure needed to meet demand while ensuring low costs for all Californians, especially those in disadvantaged communities or low-income communities” (p. 102).

The economic growth, equity and job creation opportunities are vast in this expansive transformation. That’s why LACI and members of the Transportation Electrification Partnership are calling for the creation of the [California Electric Vehicle Authority](#), led by an EV czar in the Governor’s Office to:

- Serve as the unified face of transportation electrification and zero emissions goods movement, coordinating across statewide efforts to update interim targets, create clear responsibility and ensure accountability.
- Create a set of financing tools to support the transition and economic development, including examining where existing sources of financing can be enhanced and leveraged, while identifying new sources that can be used to unlock private capital. These tools could include, but are not limited to economic recovery bonds (e.g. directly fund infrastructure, seed funding for loan guarantees, revolving loans, etc.); forward financing by borrowing from future credit generators as collateral for low-interest loans; loan guarantees to reduce cost of capital and incentivize matching funds; and other ideas to help unlock private capital markets.

As noted in the draft report update, medium- and heavy-duty vehicle infrastructure buildouts have unique needs. A key role that the CEVA could plan is to provide funding or financing programs for medium- and heavy-duty vehicle charging infrastructure development, which requires investment not only from utilities, other load serving entities and/or EV charging network companies, but also other market participants, and existing financing mechanisms do not adequately minimize the upfront capital expenditures. The CEVA could lower the risk for these build-outs to early investors/adopters to catalyze the market.

We encourage the CEC to support the creation of the California Electric Vehicle Authority to ensure that California meets its critical zero emissions transportation and climate goals.

Thank you for your leadership and for your consideration of these recommendations. Please feel free to contact me at michelle@laci.org if you would like additional information on the points above.

Sincerely,



Michelle Kinman
Director of Transportation
Los Angeles Cleantech Incubator