

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

Order Instituting Rulemaking Regarding
Transportation Electrification Policy and
Infrastructure

Rulemaking 23-12-008

**OPENING COMMENTS OF THE ALLIANCE FOR AUTOMOTIVE
INNOVATION ON THE ADMINISTRATIVE LAW JUDGE'S RULING
INITIATING TRACK 1 AND INVITING PARTY COMMENT**

Dan Bowerson
Vice President, Energy & Environment

Alliance for Automotive Innovation
2000 Town Center - Suite 625
Southfield, MI 48075
Telephone: 248.327.1777
Email: dbowerson@autosinnovate.org

Dated: July 2, 2024

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

Order Instituting Rulemaking Regarding
Transportation Electrification Policy and
Infrastructure

Rulemaking 23-12-008

**OPENING COMMENTS OF THE ALLIANCE FOR AUTOMOTIVE
INNOVATION ON THE ADMINISTRATIVE LAW JUDGE’S RULING
INITIATING TRACK 1 AND INVITING PARTY COMMENT**

I. INTRODUCTION

The Alliance for Automotive Innovation (“Auto Innovators”) appreciates this opportunity to comment on the proposal to pause implementation of the TE Rebate Program, including ME&O, and the LITE Program. From the manufacturers producing most vehicles sold in the U.S. to autonomous vehicle innovators to equipment suppliers, battery producers and semiconductor makers – Alliance for Automotive Innovation represents the full auto industry, a sector supporting 10 million American jobs and five percent of the economy. Active in Washington, D.C. and all 50 states, the association is committed to a cleaner, safer and smarter personal transportation future (see www.autosinnovate.org).

II. RESPONSES TO QUESTIONS POSED IN ALJ RULING

Response to Question 1:

The CPUC *should not* pause implementation of the TE Rebate Program, including ME&O, and the LITE Program.

Auto Innovators shares the concerns expressed in the OIR and the ALJ Ruling regarding the urgency (and cost) of addressing energization delays and the affordability of electricity rates. Both are potential threats to EV adoption, and they are both matters of serious concern to all ratepayers. Nonetheless, Auto Innovators believes that refocusing the CPUC's effort and ratepayers' dollars on energization need not preclude continuing the highly targeted programs authorized for Funding Cycle 1.

In D.22-11-040, the Commission took great care to confine future expenditures of ratepayer funds on EV Charging Infrastructure to elements of the ZEV transition which are most beneficial to residents of disadvantaged communities and where the transition is most challenging, electrification of small to medium medium/heavy duty fleets and adoption of light duty EVs by residents in multiunit dwellings. The benefits are the same today. Meanwhile the barriers to electrifying these market segments have grown steeper, with recent cuts to CARB and CEC programs driven by the state's budget shortfall. Given that CPUC programs are not exposed to the volatility of tax receipts and GHG auction revenues, it is imperative that they remain in place to provide some degree of stability to the ZEV transition in these most vulnerable market segments.

Insufficient access to convenient, reliable and affordable charging infrastructure remains the principal barrier to EV adoption in California, despite historic investments by OEMs, utilities, EVSPs and all levels of government. Many prospective EV drivers,

especially those living in multi-family housing and low/moderate income communities, lack opportunities to charge at home. Providing viable options for renters and those living in multi-family housing will significantly expand the OEMs' addressable market for EVs. To help California realize its ambitious EV adoption goals the CPUC should continue to support this market segment.

Auto Innovators recommends swiftly rescoping this track to develop the program handbook for Funding Cycle 1 (FC1) and take any other necessary steps to assure there is no gap between the exhaustion of funding for the current utility programs (Funding Cycle 0) and the launch of FC1.

Response to Question 2:

Auto Innovators does not currently have a response to this question, but we reserve the right to respond in Reply Comments.

III. CONCLUSION

Auto Innovators appreciates this opportunity to respond to the questions posed in the ALJ's Ruling.

Respectfully submitted,

By: /s/ Dan Bowerson

Dan Bowerson
Vice President, Energy & Environment

Alliance for Automotive Innovation
2000 Town Center - Suite 625
Southfield, MI 48075
Telephone: 248.327.1777
Email: dbowerson@autosinnovate.org

July 2, 2024