



November 14, 2022

California Air Resources Board  
1001 I Street  
Sacramento, California 95814

Submitted online via <https://ww2.arb.ca.gov/applications/public-comments>

**Re: Draft Fiscal Year 2022-23 Funding Plan for Clean Transportation Incentives**

Dear CARB Staff:

The California Electric Transportation Coalition (CalETC) appreciates the opportunity to provide our feedback on the Draft Fiscal Year 2022-23 Funding Plan for Clean Transportation Incentives (Draft Funding Plan). We also appreciate CARB staff's work on balancing competing needs for funding and willingness to consider stakeholder input.

CalETC supports and advocates for the transition to a zero-emission transportation future to spur economic growth, fuel diversity and energy independence, contribute to clean air, and combat climate change. CalETC is a non-profit association committed to the successful introduction and large-scale deployment of all forms of electric transportation. Our Board of Directors includes representatives from: Los Angeles Department of Water and Power, Pacific Gas and Electric, Sacramento Municipal Utility District, San Diego Gas and Electric, Southern California Edison, Southern California Public Power Authority, and the Northern California Power Agency. In addition to electric utilities, our membership includes major automakers, manufacturers of zero-emission trucks and buses, electric vehicle charging providers, autonomous electric vehicle fleet operators, and other industry leaders supporting transportation electrification.

In addition to CalETC's membership, we manage a large coalition of industry and consumer groups, and coordinate closely with environmental and environmental justice stakeholders, in support of adequate and reliable funding for the Low Carbon Transportation Programs at CARB. CalETC appreciates CARB's yearly efforts to create a comprehensive funding plan that prioritizes investment in disadvantaged and low-income communities and ensure consumer incentives are provided to those middle-class consumers most likely to respond to incentive programs. We will continue to advocate within the Legislature and with the Administration to ensure adequate and reliable funding is provided for these programs.

**Clean Vehicle Rebate Project (CVRP)**

CalETC supports CARB's decision to defer implementation of the second decrease of the income caps in CVRP. We greatly appreciate CARB staff's analysis of this issue and willingness to adjust the Draft Funding Plan as market conditions changed. CVRP is the most successful incentive program

for light-duty electric vehicles (EVs) in California and the U.S. The program has been modified over the last 5 years to focus on middle-class and low- and moderate-income car buyers, and only about 50 percent of new EV purchasers receive the CVRP incentive. Of those receiving the incentive, over 90 percent indicate the incentive was an important factor in their EV purchase decision.

Additionally, with Tesla priced out of the program and there being a surplus of funds, maintaining the income caps allows low-income and some middle-class people to access the incentive and continue to expand EV adoption.

We support the increased rebate for low- and moderate-income consumers. As CARB's analysis shows, the average price of an EV has increased significantly as consumer interest in EVs has grown due to higher gas prices and vehicle shortages due to global supply chain issues. There is clearly a need for increased funding for low- and moderate-income consumers if we are going to meet our equity goals for providing access to ZEV technologies. Because of the increased costs of EVs, CalETC recommends maintaining funding for vehicle incentives instead of redirecting funds to provide pre-paid charge cards. While we recognize CARB's concerns for individuals who must rely on more expensive public charging because they cannot charge their vehicles at home where electricity rates are cheapest, this should not be at the expense of providing funding for consumers to purchase ZEVs.

### Electric Power Take-off (ePTO) Devices

CalETC supports the proposed 25 kWh power capacity requirement for the higher funding level. We greatly appreciate CARB's responsiveness to our comments on this issue and believe that this will help reduce emissions from trucks using axillary functions in the field that require a PTO device. ePTOs will continue to be an effective bridge technology for reducing emissions while California transitions its MHD truck fleet to zero-emission.

Thank you for your consideration of our comments. Please do not hesitate to contact me if you have any questions at [kristian@caletc.com](mailto:kristian@caletc.com) or (916) 551-1943.

Sincerely,



Kristian Corby

Deputy Executive Director

California Electric Transportation Coalition