



BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

FILED

01/19/24

04:59 PM

R2312008

Order Instituting Rulemaking Regarding
Transportation Electrification Policy and
Infrastructure.

RULEMAKING 23-12-008
(Filed December 14, 2023)

**Comments of Center for Sustainable Energy® in Response to the Order
Instituting Rulemaking regarding Transportation Electrification Policy and
Infrastructure and Closing Rulemaking 18-12-006**

Center for Sustainable Energy®

January 19, 2024

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I. INTRODUCTION

Center for Sustainable Energy® (CSE) appreciates the opportunity to provide these Comments in response to the *Order Instituting Rulemaking regarding Transportation Electrification Policy and Infrastructure and Closing Rulemaking 18-12-006* (OIR), filed on December 14, 2023. CSE is a national nonprofit that accelerates adoption of clean transportation and distributed energy through effective and equitable program design and administration. Governments, utilities and the private sector trust CSE for its data-driven and software-enabled approach, deep domain expertise and customer-focused team. CSE's fee-for-service business model frees it from the influence of shareholders, members and donors, and ensures its independence. In California, CSE is pleased to implement the Funding Cycle 1 (FC1) Behind-the-Meter (BTM) Rebate Program on behalf of the California Public Utilities Commission (CPUC or Commission) and the California Electric Vehicle Infrastructure Project (CALeVIP) on behalf of the California Energy Commission (Energy Commission). Accordingly, CSE is pleased to provide comments in response to the OIR.

II. TIMELY ENERGIZATION OF EV CHARGING

CSE supports the Commission's proposal to prioritize the timely energization of electric vehicle (EV) charging infrastructure, which will enable more rapid and widespread EV infrastructure deployment. CSE appreciates the Commission's previous efforts to establish interim minimum electric vehicle supply equipment (EVSE) energization timelines and looks forward to the adoption of more permanent timelines, as required under Senate Bill (SB) 410.¹ CSE recommends the Commission leverage lessons learned from the previous efforts to establish energization timelines as well as from related initiatives at the Energy Commission. For example, the Energy Commission is currently developing an EV infrastructure project tracker to track delays in deploying EV infrastructure, including delays related to permitting, utility design, construction, and energization. As part of this tracker, the Energy Commission

¹ Senate Bill 410(Stats. 2023, Ch. 394).

has proposed utilizing a data portal, database, and dashboard to further streamline the collection and visualization of data on EV infrastructure deployment delays. CSE encourages the Commission to adopt a similar data-driven approach to tracking energization timelines and develop measures to validate data submitted by investor-owned utilities (IOUs), permitting agencies, and/or other entities. CSE contends that such tools and verification measures could help the IOUs comply with the requirements under Assembly Bill (AB) 50² to share energization information with local governments. Additionally, CSE recommends the Commission identify and address energization challenges unique to medium- and heavy-duty (MD/HD) charging infrastructure, as these projects tend to be more complex than comparable light-duty projects and will become increasingly prominent over the next several years. Lastly, given the overlap between energization and interconnection issues, CSE recommends that Rulemaking (R.)23-12-008 be coordinated with R.17-07-007, the Commission's Rulemaking to Consider Streamlining Interconnection of Distributed Energy Resources and Improvements to Rule 21.

III. TRANSPORTATION ELECTRIFICATION GRID PLANNING TO SUPPORT CHARGING INFRASTRUCTURE DEPLOYMENT

CSE supports the Commission's efforts to facilitate EV charging infrastructure deployment through enhanced grid planning. CSE recommends these grid planning processes coordinate with and complement existing transportation electrification initiatives. For example, CSE suggests the energization processes described above be incorporated into grid planning processes, to ensure that sufficient grid capacity is available to provide timely energization. CSE also supports the Commission's proposed Zero-Emission Freight Infrastructure Planning (FIP) framework. CSE recommends the development and implementation of this framework leverage the FC1 BTM Rebate Program, to help incentivize the deployment of MD/HD infrastructure in key freight corridors. CSE also recommends the

² Assembly Bill 50 (Stats. 2023, Ch. 317).

Commission leverage existing analyses, such as the Energy Commission's AB 2127³ and SB 1000 reports,⁴ to inform grid planning efforts. These reports identify county-by-county infrastructure needs and assess inequitable infrastructure deployment throughout the state, which could provide useful insights for grid planning.

Additionally, CSE encourages the Commission to explore ways to provide greater transparency in how grid data is reported to the Commission and made available to the public. CSE appreciates the Commission's efforts to streamline IOU program reporting through the development of a Data Assessment, as required under Decision (D.)22-11-040. CSE recommends that, as part of the development of the Data Assessment, the Commission examine and consider the use of standardized methodologies for how IOU data is reported and processed, and that these methodologies be described in sufficient detail so that they can be reproduced by third parties. This will facilitate grid planning by IOUs, independent evaluation by third parties, and utilization of public tools such as the Integration Capacity Analysis (ICA) maps.

Lastly, CSE recommends the Commission incorporate considerations regarding the deployment of distributed energy resources (DERs) into the grid planning processes for transportation electrification. DERs have the potential to directly power EV infrastructure, provide resiliency benefits for charging station operators, and enable technologies like smart charging and vehicle-grid integration (VGI). Including DER considerations into grid planning processes will yield a better understanding of grid capacity constraints and inform the buildout of grid infrastructure. Accordingly, CSE suggests the Commission consider coordinating activities under the R.23-12-008 proceeding with R.21-06-017, the Commission's

³ California Energy Commission, Second Assembly Bill (AB) 2127 Electric Vehicle Charging Infrastructure Assessment: Assessing Charging Needs to Support Zero-Emission Vehicles in 2030 and 2035.

⁴ California Energy Commission, 2022 Senate Bill 1000 California Electric Vehicle Infrastructure Deployment Assessment: Drive Times to Direct-Current Fast Chargers.

Rulemaking to Modernize the Electric Grid for a High Distributed Energy Resources Future, as well as with R.17-07-007, as mentioned above.

IV. DEPLOYMENT OF BEHIND-THE-METER CHARGING INFRASTRUCTURE TO SUPPORT STATE GOALS

CSE strongly supports the Commission's proposal to prioritize the deployment of BTM charging infrastructure, including implementation of the FC1 BTM Rebate Program. Accordingly, CSE recommends the Commission prioritize the launch of the FC1 BTM Rebate Program, including adoption of the Program Handbook and any necessary updates to reporting requirements. Timely implementation of the FC1 BTM Rebate Program will help advance California's transportation electrification goals by facilitating the deployment of MD/HD charging infrastructure and light-duty charging infrastructure in multi-unit dwellings (MUDs).

CSE also recommends that, where appropriate, the Commission coordinate with other agencies to align eligibility criteria and enable incentive stacking for MD/HD infrastructure. For example, CSE highlights the California Air Resources Board's (CARB) Proposed Amendments to the Low Carbon Fuel Standard (LCFS) program, which include a proposal to expand the Fast Charging Infrastructure (FCI) capacity credits to owners of MD/HD charging and refueling infrastructure. If adopted, this amendment could enhance the cost-effectiveness of deploying MD/HD infrastructure. Harmonizing requirements and streamlining incentive stacking across programs would enable MD/HD fleet operators to maximize cost savings and facilitate greater deployment of infrastructure necessary to meet California's expected charging demand.

V. ONGOING TRANSPORTATION ELECTRIFICATION POLICY DEVELOPMENT AND COLLABORATION

CSE supports the CPUC's proposal to incorporate ongoing transportation electrification policy developments into the scope of the Commission's R.23-12-008 proceeding. While CSE does not offer any specific recommendations at this time, CSE highlights the rapidly evolving

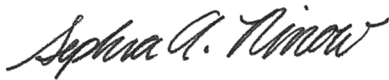
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nature of the transportation electrification landscape over the last few years and the development of myriad incentive programs from state and federal agencies. Accordingly, CSE encourages the Commission to adopt a flexible approach to incorporating and implementing any new legislation or policies in this sector. This may include adjusting to new or unforeseen market conditions, regulatory developments, or programs. As mentioned above, CSE recommends the Commission coordinate with other agencies to align program requirements and enable incentive stacking, where appropriate, in order to advance California's transportation electrification goals.

VI. CONCLUSION

CSE appreciates the opportunity to provide these Comments in response to the OIR and looks forward to continued engagement in R.23-12-008.

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