

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



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Order Instituting Rulemaking to Establish
Energization Timelines

Rulemaking No. 24-01-018

**OPENING COMMENTS OF TERAWATT INFRASTRUCTURE, INC. ON ORDER
INSTITUTING RULEMAKING TO ESTABLISH ENERGIZATION TIMELINES**

Scott Dunbar
Grant Snyder
KEYES & FOX LLP
580 California Street, 12th Floor
San Francisco, CA 94104
Telephone: (949) 525-6016
E-mail: sdunbar@keyesfox.com
gsnyder@keyesfox.com

February 9, 2024

Counsel to Terawatt Infrastructure

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Pursuant to Rule 6.2 of the Rules of Practice and Procedure of the California Public Utilities Commission (the “Commission”), Terawatt Infrastructure, Inc. (“Terawatt”) hereby submits these comments on the *Order Instituting Rulemaking to Establish Energization Timelines* (“OIR” or “Rulemaking”).

I. INTRODUCTION

A major barrier to California accomplishing its clean energy goals is the length of time it takes for its utilities to energize projects after a customer submits an interconnection or upgrade request. These delays slow the development of new housing projects, reduce the availability of charging stations for electric vehicles, and extend the air quality issues impacting millions of Californians. In response, the California State Assembly passed Senate Bill 410 and Assembly Bill 50 which task the Commission with addressing this energization delay. Accordingly, the Commission issued this Rulemaking on January 25, 2024 to implement portions of these bills.

Terawatt submits these opening comments to support the scope of this OIR set forth in the Preliminary Scoping Memo and to echo the need for this proceeding to address the energization of facilities which charge Medium Duty and Heavy Duty (“MDHD”) electric vehicles. Terawatt designs, operates, and owns electric vehicle charging hubs for fleet operations. These facilities require significant amounts of power and Terawatt’s requests for interconnection or service

upgrade are often subject to long wait times. Terawatt was founded to address the inevitable transition to all-electric transportation and, as such, supports this Rulemaking and urges the Commission to adopt robust standards that provide a pathway for California to achieve its transportation electrification goals.

II. COMMENTS

The Preliminary Scoping Memo states that the goals of this proceeding are the establishment, by September 30, 2024, of: (1) reasonable average and maximum target energization periods, (2) a procedure for customers to report energization delays, and (3) criteria for timely energization for electric customers.¹ Terawatt supports the scope for this proceeding and applauds the Commission for using this first rulemaking implementing Senate Bill 410 and Assembly Bill 50 to resolve these critical issues that will help to chart a pathway for timely energization.

Terawatt also urges the Commission to adopt in this proceeding reasonable timelines, procedures to resolve delay, and criteria for timely energization for customers with significant demand. In particular, Terawatt encourages the Commission to establish rules in this OIR which will facilitate the timely energization of projects which charge MDHD electric vehicles. These projects will be essential for California to meet the MDHD electric vehicle adoption goals set forth in the Advanced Clean Trucks, *Cal. Code. Regs. tit. 13 § 1963.1*, and Advanced Clean Fleets, *Cal. Code. Regs. tit. 13 §§ 2013-2016*, regulations adopted by the California Air Resources Board. Moreover, Senate Bill 410 explicitly states that the rules adopted by the Commission in this proceeding should address MDHD electric vehicle charging facilities. The bill states that the “Legislature finds and declares [that] . . . [t]here are many reports of individual customers who are

¹ *Order Instituting Rulemaking to Establish Energization Timelines*, R.24-01-018, at 3-4 (Jan. 25, 2024).

unable to have their electrical service promptly upgraded or energized and charging stations for light-duty, **medium-duty, and heavy-duty vehicles** and off-road vehicles, vessels, trains, and equipment that are unable to be promptly energized. These delays may inhibit the state’s ability to meet its decarbonization goals and federal, state, regional, and local air quality and decarbonization standards, plans, and regulations.”² Thus, Terawatt requests that the Commission enact the will of the legislature and adopt transparent and clearly documented energization processes, which facilitate MDHD electric vehicle charging and adoption.

III. CONCLUSION

Terawatt appreciates the opportunity to provide comments to the Commission on energization timelines. Terawatt looks forward to working with the Commission and other stakeholders to develop strategies around how to facilitate timely energization which will allow California to meet its transportation electrification goals in the years to come.

Dated: February 9, 2024

Respectfully submitted,

BY: /s/ Scott Dunbar

Scott Dunbar

Grant Snyder

KEYES & FOX LLP

580 California Street, 12th Floor

San Francisco, CA 94104

Telephone: (949) 525-6016

E-mail: sdunbar@keyesfox.com

gsnyder@keyesfox.com

Counsel to Terawatt Infrastructure

² Senate Bill 410, CAL. PUB. UTIL. CODE § 932(a)(4) (emphasis added); *see id.* at § 933(c) (“It is the policy of the state that each electrical corporation . . . [p]romptly energize new customers, including by ensuring that new housing, new businesses, new electric equipment in buildings, and new charging for light-duty, **medium-duty, and heavy-duty vehicles** and off-road vehicles, vessels, trains, and equipment can be used without delay caused by a failure of the electrical corporation to implement energization projects.” (emphasis added)).