BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

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COMMENTS OF THE VEHICLE-GRID INTEGRATION COUNCIL ON ORDER INSTITUTING RULEMAKING TO ESTABLISH ENERGIZATION TIMELINES

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In accordance with the Rules of Practice and Procedure of the California Public Utilities Commission ("Commission"), the Vehicle-Grid Integration Council ("VGIC") hereby submits these comments on the *Order Instituting Rulemaking to Establish Energization Timelines* ("OIR"), issued by Administrative Law Judge ("ALJ") on January 30, 2024.

I. INTRODUCTION

VGIC commends the Commission for issuing the OIR to establish reasonable average and maximum target energization timelines and address additional Commission responsibilities under Senate Bill ("SB") 410 and Assembly Bill ("AB") 50. Electric vehicle ("EV") adoption in California is increasing quickly and bringing with it an urgent need to energize new EV charging sites. Given that these energization projects differ in nature from traditional new service requests, primarily due to the relatively short timeline in which they can be constructed, and the influx of other types of customer end uses seeking to electrify, California is confronted with a unique challenge: lengthy energization timelines that frustrate customers and obstruct California's ability to reach its Advanced Clean Cars, Advanced Clean Fleets, Advanced Clean Trucks, and broader multi-sector decarbonization goals. VGIC generally supports the Commission's focus on establishing average and maximum energization timelines and establishing a procedure for

customers to report energization delays, as this approach can provide the foundation for achieving faster energization timelines. However, as detailed in Section III below, establishing target timelines, customer reporting processes, utility reporting requirements, and utility staffing plans alone will not be sufficient to achieve timely energization for the coming wave of transportation and building electrification.

To mitigate against worsening energization bottlenecks, it is essential for the Commission to explicitly develop **a comprehensive suite of solutions to achieve timely energization** instead of limiting itself to the narrow scope of items considered in SB 410 and AB 50. While VGIC believes that establishing reasonable average energization timelines is important, it would be a disservice to energizing customers and all ratepayers to overlook inherently flexible vehicle-grid integration ("VGI") solutions and other well-established load flexibility approaches as tools to help advance timely energization. Additionally, given the state's decarbonization goals and the growing popularity of customer-sited generation, including vehicle-to-everything ("V2X") solutions, it is reasonable to expect a meaningful portion of new energization projects will include customer-sited generation / distributed energy resources ("DERs") that can export power back to the grid and will also need to move through the Rule 21 interconnection process in a timely manner. VGIC details in Section III below recommended enhancements to the preliminary scope to promote (a) the development of a comprehensive suite of solutions to facilitate timely interconnection and (b) adequate coordination between load energization and generation interconnection processes.

II. BACKGROUND & INTEREST IN PROCEEDING.

VGIC is a 501(c)6 member-based advocacy group committed to advancing the role of EVs and VGI through policy development, education, outreach, and research. VGIC supports the transition to

a decarbonized transportation and electric sector by ensuring the value from flexible EV charging and discharging is recognized and compensated to achieve a more reliable, affordable, and efficient electric grid. VGIC's members include automotive original equipment manufacturers ("OEMs"), EV service providers ("EVSPs"), distributed energy resource ("DER") aggregators, and publicly-owned electric utilities. VGIC holds a direct interest in shaping the policies, procedures, and rules needed to develop the infrastructure required to support the timely energization of transportation electrification ("TE"). VGIC has been an active party in related rulemakings ("R.") such as R.18-12-006, R.21-06-017, R.17-07-007, R.23-12-008, and R.22-07-005.

III. COMMENTS ON THE PROPOSED SCOPE.

VGIC appreciates the magnitude of challenges facing both the IOUs and customers regarding the increasingly lengthy gaps between when a customer requests the energization of a new electrical connection, including connections used to charge EVs, and the IOU's ability to energize that site. As discussed at the Commission's recent *AB 50 and SB 410 Energization Process and Timeline Workshop*,[1] the challenges related to timely energization range from situations that are in the IOUs' control, such as determining if a grid upgrade is needed through the distribution planning process, to situations that are out of the IOUs' control, such as upgrade equipment supply chain constraints (e.g., materials needed to upgrade distribution system). The OIR's preliminary scope seems to account for many of the challenges discussed during the Workshop, but VGIC identifies below several key issues that do not appear to be preliminarily scoped into the OIR.

[1] CPUC. *Administrative Law Judge's Ruling Admitting the February 2, 2024, Workshop Slides into the Record*. February 14, 2024. *See:* https://www.cpuc.ca.gov/-/media/cpuc-website/divisions/energy-division/documents/infrastructure/energization/ab50_sb410-energization-workshop_02022024.pdf

A. The Commission should consider scoping in a Phase 2 to focus on flexible service connection and other innovative solutions to achieve the energization timeline goals established by September 30, 2024, or, at a minimum, ensure these solutions are addressed in the new TE OIR (R.23-12-008).

Setting energization timelines and related processes required by SB 410 and AB 50 is necessary to accelerate the energization of new electrical connections but is insufficient. VGIC strongly believes utilities and customers should be permitted and incentivized to use every tool available to accelerate energization, including VGI and other load flexibility strategies that can help avoid or defer infrastructure upgrades. One such tool is currently being facilitated through Southern California Edison's ("SCE") Automated Load Control Management Systems ("LCMS") pilot, which allows the use of "customer-side, third party owned, automated load management systems" to energize EV charging equipment that exceeds the utility's electrical capacity at that site, thereby deferring or avoiding the need for time-consuming – and costly – utility-side infrastructure upgrades.[2] While there are limited examples of this being permitted in California, it is unclear under precisely what framework, incentives, technical requirements, and customer education processes this operates. The lack of transparency surrounding the design and extent to which these tools are being implemented muddies the emerging picture of energization timeline challenges and creates a need for stakeholders to focus on these flexible solutions within the context of this OIR. As such, VGIC recommends the Commission consider scoping Phase 2 to establish policies, rules, regulations, and guidelines for implementing flexible service connection and other tools to mitigate delays to energization. Alternatively, if the Commission does not establish a Phase 2 in this OIR to address these solutions, VGIC urges the Commission to at least explicitly scope this matter into the new TE OIR (R.23-12-008).

[2] SCE Advice Letter 5138-E and 5138-E-A: *Establishment of Southern California Edison Company's Customer-Side, Third Party Owned, Automated Load Control Management Systems Pilot.* Approved January 16, 2024; Effective January 3, 2024.

VGIC notes solutions and frameworks worth considering include SCE's LCMS pilot as well as: load management software that can ensure site load does not exceed a given threshold; storage-backed charging that can provide a "buffer" between load and the grid; maps and other planning tools to inform customers and site developers when these solutions could or should be used; forms and processes to guide customers and site developers using these solutions through the utility energization process; shared savings models or technology deployment incentive programs to encourage customer and site host election of these solutions; and utility reporting requirements to indicate the amount and characteristics of sites that use these solutions.

Much progress has been made in California and around the country on these topics. In addition to the SCE LCMS pilot detailed above, Pacific Gas and Electric ("PG&E") has detailed the cost savings from using these solutions within their EV Charge Network ("EVCN") program[3]; UL has recently published the UL 3141 certification standard to ensure safe and reliable use of these systems[4]; New York's proposed Load Management Technology Incentive Program ("LMTIP") to directly incentivize the deployment of these solutions above what is available through make-ready programs to ensure customers in New York can achieve timely energization and help meet the state's transportation decarbonization goals[5]; and Draft Resolution E-5296 would establish a Limited Generation Profiles framework to facilitate faster interconnection for

[3] *See*, A.21-10-010. PG&E Prepared Testimony at Ch 5-2: "ALM us used to share available electrical capacity among charging stations to avoid the installation cost of additional electrical capacity. PG&E will build off the successful use of ALM in EVCN, whereby costs were reduced and physical design constraints were overcome at customer sites that were deemed a good fit to use this technology." *See also,* PG&E ALM/EV EMS Workshop Presentation. January 29, 2021. "Savings [from ALM] ranged from $30,000 to $200,000 per project."

[4] UL Standards & Engagement. *UL 3141: UL LLC Outline of Investigation for Power Control Systems.* Published January 11, 2024. https://www.shopulstandards.com/ProductDetail.aspx?UniqueKey=45654

[5] Joint Utilities' Electric Vehicle Load Management Technology Incentive Program ("LMTIP"). Case 22-E-036. https://documents.dps.ny.gov/public/Common/ViewDoc.aspx?DocRefId=%7BC01E3588-0000-CC11-824F-591C19658923%7D

customer-owned generation utilizing Integration Capacity Map values, which is a related concept and framework that could be adapted to support timely energization.[6]

Yet another innovative solution that merits consideration in Phase 2 is core energization process improvements in which third-party certified electricians can authorize and/or conduct necessary upgrades, thereby mitigating the need for utilities to dispatch an employee to every site requiring an upgrade. With residential, commercial, and industrial customers seeking upgrades for EV charging, solar, energy storage, heat pumps, appliances, and other loads, the current process of dispatching utility employees to every individual site will be entirely insufficient at the scale anticipated and the pace desired by state policy. VGIC recognizes that utilizing third-party services and solutions in this way would represent a relatively novel approach within the energization process, and we strongly believe that safety and reliability should always come first when piloting or developing mass-market approaches like this. Phase 2 of this OIR or, at a minimum, scoping items in the new TE OIR R.23-12-008, is likely the right place to consider these innovative solutions given their importance and complexity.

B. The Commission should ensure close coordination with the Rule 21 interconnection process is included in the scope of this proceeding.

Given customer interest in DERs and the inherent capabilities of EVs as grid-supportive DERs, VGIC anticipates many customers seeking new or expanded electrical service under Rules 15/16 and 29/45 might also seek a generation interconnection agreement under Rule 21. With this in mind, VGIC believes changes to the energization process, customer reporting process, and utility reporting requirements should be closely coordinated with the corresponding policies

[6] CPUC Draft Resolution E-5296. *Approving in part and modifying Pacific Gas and Electric Company's, Southern Edison Company's, and San Diego Gas & Electric Company's Advice Letters, submitted per Resolutions E-5211 and E-5230, providing the specifics and process of Limited Generation Profiles*. https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M523/K916/523916569.PDF

applicable to Rule 21. For example, the Commission should consider whether customers seeking both load energization and generation interconnection should be given the choice to undergo each process *sequentially* or *in parallel*. Similarly, the two processes should coordinate forms, study timelines, utility points of contact for customers, technical assistance, infrastructure upgrades, and related steps. VGIC believes customers should be permitted to seek processes *either* sequentially or in parallel and that the necessary information and steps for both pathways are clearly communicated and streamlined. As such, VGIC strongly recommends the Commission include in the scope of this OIR an issue, track, or Phase dedicated to streamlining the experience for customers that are seeking both load energization and Rule 21 generation interconnection. VGIC offers this not as a replacement for the open Rule 21 proceeding (R.17-07-007) but as an area where increased coordination is needed.

IV. PROCEDURAL SCHEDULE, CATEGORIZATION, AND NEED FOR HEARINGS.

VGIC supports the categorization and proposed schedule of this proceeding and agrees with the preliminary determination that no hearings will be needed.

V. NOTICES.

Service of all notices and communications in this proceeding should be directed to the following VGIC representative:

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VI. CONCLUSION.

VGIC appreciates the opportunity to provide these comments on the OIR. We look forward to further collaboration with the Commission and stakeholders on this initiative.

Respectfully submitted,

/s/ Zach Woogen
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VEHICLE-GRID INTEGRATION COUNCIL

Date: February 20, 2024