

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



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Application of Pacific Gas and Electric
Company to Revise Its Electric Marginal
Costs, Revenue Allocation, and Rate Design.

Application 24-09-014 A2409014
(Filed September 30, 2024)

MOTION FOR PARTY STATUS OF ELECTRIFY AMERICA, LLC

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November 25, 2024

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OF THE STATE OF CALIFORNIA**

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I. INTRODUCTION

In accordance with Rule 1.4 and 11.1 of the California Public Utilities Commission (“Commission”) Rules of Practice and Procedure, Electrify America, LLC (“Electrify America”) hereby respectfully submits this motion for party status in the above-captioned proceeding, Application 24-09-014.

II. INTEREST IN THIS PROCEEDING

CPUC Rule of Practice and Procedure 1.4(a)(4) (“CPUC Rule 1.4(a)(4)”) allows an interested entity to become a party by filing a motion to do so. Pursuant to CPUC Rule 1.4(b), the entity seeking party status shall: (1) disclose the persons and entities in whose behalf the motion is made and set forth the interests of that entity; and (2) articulate the factual and legal contentions of the entity, and demonstrate those contentions are reasonably pertinent to the issues already presented. The party on whose behalf this motion is made is Electrify America. Electrify America submits the following arguments in support of its Motion for Party Status.

A. Description of Electrify America

Electrify America, headquartered in Reston, Virginia, has committed to invest \$2 billion over ten years nationwide on zero-emissions vehicle (“ZEV”) infrastructure, education and awareness, and access efforts to support the increased adoption of ZEV technology in the United States. Electrify America is investing over \$800 million in California, one of the largest ZEV markets in the world. Electrify America is building a nationwide network of ultra-fast direct current fast charging stations (“DCFCs”) and has deployed over 4,250 individual fast chargers across over 950 charging stations in North America, with more than 260 of those stations located in California, many of which allow for hyper-fast 350kW charging.

Electrify America’s relationship with owners and operators of electric vehicles are unique based upon its business model. Electrify America’s chargers range from 150 kW to 350 kW of power based on anticipated needs and use cases, as well as available real estate and power. The hyper-fast 350 kW chargers are among the most powerful public chargers on the market today, capable of recharging speeds close to gasoline fueling. Through extensive research and stakeholder outreach as outlined in Electrify America’s ZEV investment plans¹, Electrify America believes this fast-charging customer experience is crucial to enabling mass-market consumers to adopt EVs, especially for long-distance travel and in metropolitan areas where large segments of the population may not have access to workplace or home charging. In addition, Electrify America stations are designed for universal customer access through the inclusion of credit card readers and non-proprietary fast-charging connector standards, including SAE combo and at some locations

¹ Available at <https://www.electrifyamerica.com/our-plan/>, last accessed on November 22, 2024.

CHAdemo. Electrify America has also committed to offering the NACS connector in 2025.²

Accordingly, Electrify America's interests are individual and cannot be represented adequately by any other party in this proceeding.

As an operator of an electric vehicle charging network with over 100 existing charging locations comprising of over 500 individual fast chargers in total within Pacific Gas and Electric's territory, Electrify America has a direct and substantial interest in this proceeding.

B. The Instant Proceeding Presents Information that is Reasonably Pertinent to the Day-to-Day Operations and Strategy of Electrify America in its Continued Development of its Direct Current Fast Charging Network in California.

The stated purpose of the instant proceeding is for Pacific Gas and Electric ("PG&E") to revise marginal costs, allocate revenues, and design rates, including adjustments to the Business Electric Vehicle ("BEV") Rate schedules under which Electrify America currently takes service. As stated above, Electrify America develops DCFC stations along the major highway corridors and within population centers in California, including the service territory of PG&E. The proposed changes in the rate including modifications to BEV rates will significantly impact the economics behind planning, locating, and deploying DCFC stations by increasing Electrify America's costs, and the pace at which such work can be conducted. Beyond the direct impact to Electrify America's internal business operations and strategy, this proceeding will affect the service rates under which Electrify America provides service to EV-charging customers. The implementation of a rate design which drastically increases costs will directly affect the value of these services. Electrify America intends to advocate for its

² A "charging station" should be differentiated from a "charging port" or "connector." Each charging station is made up of several individual connectors.

interests in this proceeding specific to the BEV rate schedules, as well as any other proposed modifications to PG&E's services that relate to Electrify America's DCFC network.

Electrify America actively tracks and participates in regulatory proceedings across the country addressing rate design and marginal costs related to commercial electric vehicle charging and can contribute its experience and expertise to a fair and reasonable resolution of this proceeding. At this time, Electrify America respectfully requests party status to actively participate in this proceeding and provide crucial evidence for the Commission's review.

III. Notice

Service of notices, orders, and other correspondence in this proceeding should be directed to Electrify America, c/o Davison Van Cleve, P.C., at the address set forth below:

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With courtesy copies to Mr. Stephen Bright at the following address (electronic service preferred):

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IV. Conclusion

Electrify America's participation in this proceeding will not prejudice any party and will not delay the schedule or broaden the scope of the issues in the proceeding. For the reasons stated above, Electrify America respectfully requests that the CPUC grant this Motion for Party Status.

Dated this 25th day of November 2024.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

/s/ Robert D. Sweetin

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