

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

**ENERGY DIVISION**

**RESOLUTION E-5247**

**December 15, 2022**

**R E S O L U T I O N**

Resolution E-5247 Pacific Gas and Electric Company, San Diego Gas & Electric Company, Southern California Edison Company, Bear Valley Electric Service, Liberty Utilities, and PacifiCorp d/b/a PacificPower request approval of a proposed electric vehicle service equipment service energization timeline in compliance with Ordering Paragraph 8 of Resolutions E-5167 and E-5168.

**PROPOSED OUTCOME:**

- This Resolution modifies Pacific Gas and Electric Company's, San Diego Gas & Electric Company's, Southern California Edison Company's, Bear Valley Electric Service's, Liberty Utilities', and PacifiCorp d/b/a PacificPower's proposed service energization timeline to align with Ordering Paragraph 8 of Resolutions E-5167 and E-5168

**SAFETY CONSIDERATIONS:**

- There are no incremental safety considerations associated with this Resolution. The utilities must comply with the Safety Requirements Checklist for Transportation Electrification programs the California Public Utilities Commission adopted in D.18-05-040 and D.18-09-034.

**ESTIMATED COST:**

- There are no costs associated with this Resolution.

By Pacific Gas and Electric Company's AL 6607-E, Southern California Edison Company's Advice Letter 4803-E San Diego Gas & Electric's Advice Letter 4011-E, Bear Valley Electric Service Advice Letter 444-E, Liberty Utilities' Advice Letter 192-E, and PacifiCorp d/b/a PacificPower's Advice Letter 685-E filed on May 27, 2022.

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PG&E AL 6607-E, SCE AL 4803-E, SDG&E AL 4011-E, BVES AL 444-E,  
Liberty AL 192-E, PacifiCorp AL 685-E /MTX

## **SUMMARY**

**San Diego Gas & Electric Company's (SDG&E) joint request to establish an electric vehicle supply equipment (EVSE) service energization timeline, which it filed on behalf of itself, Pacific Gas and Electric Company (PG&E), Southern California Edison Company (SCE), Liberty Utilities (Liberty), Bear Valley Electric Service (BVES), and PacifiCorp d/b/a PacificPower (PacifiCorp)—(collectively, "Joint IOUs") is approved, with modifications.**

SDG&E's joint AL 4011-E, consisting of BVES AL 444-E, Liberty Utilities AL 192-E, PG&E AL 6607-E, PacifiCorp AL 685-E, and SCE AL 4803-E, (collectively, *Joint IOU AL*) proposes to establish a 160-business day average service energization timeline for projects installing electric vehicle charging infrastructure. The Joint IOUs' AL proposes to limit the adopted service energization timeline to cover tasks that are only within the IOUs' direct control, while also identifying measures to accelerate the timeline to complete tasks within their indirect control. Finally, the Joint IOUs' AL identifies options to improve the completion timeline for steps outside of the IOUs' direct control.

This Resolution approves, with modifications, the Joint IOUs' proposed average service energization timeline. The Joint IOUs must achieve an interim average service energization timeline of 125 business days for projects going through the EV Infrastructure Rules, excluding projects with a capacity exceeding two-megawatts (MW), projects that need distribution line upgrades via Electric Rule 15, and projects requiring substation upgrades. The Joint IOUs must collect and report data on sites that exceed the 125-business day average service energization timeline to inform potential modifications to the target. Within one-year of authorization of this Resolution, the Joint IOUs shall host a public workshop to discuss their efforts to achieve the 125-business day average service energization timeline. Within 60-days of hosting this public workshop, the Joint IOUs must submit a Tier 2 (T2) AL proposing an updated average service energization timeline informed by their efforts over the previous year. Finally, the Joint IOUs must collect service energization data related to processes atypical or outside of the EV Infrastructure Rules (i.e., projects going through Rule 15, projects exceeding 2MW in capacity, projects requiring substation upgrades, etc.) to inform a potential energization timeline for such projects.

PG&E AL 6607-E, SCE AL 4803-E, SDG&E AL 4011-E, BVES AL 444-E,  
Liberty AL 192-E, PacifiCorp AL 685-E /MTX

## **BACKGROUND**

On February 26, 2021, pursuant to Assembly Bill (AB) 841 (Ting, 2020) PG&E filed AL 6102-E,<sup>1</sup> SCE filed AL 4429-E, SDG&E filed AL 3705-E, and, PacifiCorp submitted AL 643-E.<sup>2</sup> On March 1, 2021, BVES submitted AL 413-E and Liberty submitted AL 166-E. Through the six ALs, the large IOUs—PG&E, SDG&E, and SCE—and the small IOUs—BVES, Liberty, and PacifiCorp--requested approval to establish new EV Infrastructure Rules,<sup>3</sup> which are optional tariffs that covers nearly the full cost of all electrical distribution infrastructure on the utility-side of the customer's meter for all customers installing separately metered infrastructure to support electric vehicle (EV) charging, other than those in single-family residences.<sup>4</sup>

On October 7, 2021, the CPUC issued Resolutions E-5167 and E-5168 that approved, with modifications, the IOUs' proposed EV Infrastructure Rules and associated Memorandum Accounts. On April 7, 2022,<sup>5</sup> the IOUs began offering service under their EV Infrastructure Rules.

Ordering Paragraph (OP) 8 of both Resolution E-5167 and E-5168 ordered the Joint IOUs to host a workshop within 180 days of the Resolutions' approval to discuss barriers to the timely energization of EV charging infrastructure. The Resolutions required the Joint IOUs, during the workshop to at minimum address: 1) the IOUs' processes and internal timeline for timely installing and energizing electrical distribution infrastructure to support EV charging, 2) the barriers within the IOUs' control that impact the IOUs' ability to meet a timely service energization average, 3) the barriers outside of the IOUs' control that impact the IOUs' ability to meet a faster service energization average, 4) the direct perspective of Electric Vehicle Service Providers (EVSPs) and other industry representatives, 5) how the IOUs can collaborate and coordinate with EVSPs and other market actors (e.g., authorities having

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<sup>1</sup> On March 17, 2021, PG&E filed a supplemental AL to replace AL 6102-E with AL 6102-E-A.

<sup>2</sup> PacifiCorp withdrew AL 643-E on May 17, 2021, and replaced it with AL 649-E filed on June 8, 2021. AL 649-E-A was filed on June 18, 2021 to clarify language in AL 649-E.

<sup>3</sup> PG&E Electric Rule 29, SCE Electric Rule 29, SDG&E Electric Rule 45, BVES Electric Rule 24, Liberty Electric Rule 24, and PacifiCorp Electric Rule 24.

<sup>4</sup> Under the EV Infrastructure Rules, ratepayers cover the costs of service line extensions and electrical distribution infrastructure, which Public Utilities Code Section 740.19(b) defines as including poles, vaults, service drops, transformers, mounting pads, trenching, conduit, wire, cable, meters, other equipment as necessary, and associated engineering and civil construction work.

<sup>5</sup> PacifiCorp started offering service under their EV Infrastructure Rule in July 2022.

PG&E AL 6607-E, SCE AL 4803-E, SDG&E AL 4011-E, BVES AL 444-E, Liberty AL 192-E, PacifiCorp AL 685-E /MTX

jurisdiction) to accelerate service energization timing, and 6) potential solutions to overcome the identified barriers.

OP 8 directed the IOUs to submit a joint T2 AL within 60 days of holding the public workshop, to propose an average service energization timeline, that, at minimum:

1. proposes a numerical target (i.e., number of business days) for average energization timing between when a customer submits an application and when their site is energized that reflects efforts to accelerate the current average service energization timeline, which was expected to be between an average of 90 and 160 days;
2. identifies the processes that are within the IOUs' direct and indirect control;
3. identifies the processes that are not within the IOUs' control [e.g., within the control of the customer, authorities having jurisdiction (AHJ), EVSP, etc.];
4. proposes a process for how the IOUs can improve the service energization timing for items that are within their direct and indirect control;
5. includes a description of how the IOU can contribute towards improving the timing for other responsibilities, if any; and
6. ensures the proposal is reflective of the discussions and feedback from the workshop, including the feedback of industry representative.

On March 28, 2022, the Joint IOUs hosted this public workshop, which had representatives from EVSPs, technology vendors, automakers, cities and counties, consumer and environmental justice organizations, state agencies, and the California Governor's Office of Business and Economic Development (GO-Biz). On April 18, 2022, Energy Division staff sent an email to the Rulemaking (R.) 18-12-006 service list to provide parties the opportunity to submit informal post-workshop comments directly to the Joint IOUs to help inform their average service energization timeline proposal. Amply Power, Inc. (AmPLY) submitted informal comments on April 24, 2022, while Electrify America (EA), and Joint EV Industry Parties<sup>6</sup> submitted informal comments on April 28, 2022. On May 27, 2022, SDG&E submitted the joint T2 AL 4011-E, consisting of BVES AL 444-E, Liberty Utilities AL 192-E, PG&E AL 6607-E, PacifiCorp AL 685-E, and SCE AL 4803-E, to propose an average EVSE service energization timeline.

The Joint IOUs' AL proposes to establish a 160-business day average service energization timeline for steps that are fully within the IOUs' direct control. The Joint

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<sup>6</sup> Consisting of ChargePoint, Inc., EVgo Services, LLC, and Tesla, Inc.

PG&E AL 6607-E, SCE AL 4803-E, SDG&E AL 4011-E, BVES AL 444-E,  
Liberty AL 192-E, PacifiCorp AL 685-E /MTX

IOUs request to limit the average service energization timeline only to projects going through their EV Infrastructure Rules, while excluding projects that require distribution line extensions or capacity upgrades. The Joint IOUs also list a number of steps they are committed to pursuing to make ongoing improvements to the energization timeline for customers, addressing steps that are both within and outside of their direct control. Finally, the Joint IOUs' AL discusses why they found some stakeholder feedback to be infeasible to implement.

*Propose a numerical target for average energization timing between when a customer submits an application and when their site is energized, between an average of 90 and 160 days*

The Joint IOUs propose that sites constructed under the EV Infrastructure Rules meet an average service energization target of 160-business days. The proposed 160-business day average includes steps in the EV Infrastructure Rules energization lifecycle that are in the direct control of the IOUs, such as civil construction work, but excludes steps outside the IOUs direct control, such as distribution system work, including work conducted under Rule 15, substation upgrades, and permitting review processes.

As the IOUs' proposed timeline is an average, they note the actual time required to energize a given site will depend on the unique conditions of that site and the complexity of the project. The Joint IOUs state that some sites will be energized faster than the proposed average timeline and some sites will require a longer timeline. The Joint IOUs additionally clarify the proposed timeline is specific only to work performed under the EV Infrastructure Rules.

The Joint IOUs note that they will continually evaluate how to improve the EV Infrastructure Rule service energization process and expect that 18 months after the EV Infrastructure Rules are introduced that the Joint IOUs will be able to offer lower average targets.

The Joint IOUs cite the following reason to support the proposed 160-business day average service energization timeline and process:

- 1. The addition of civil construction work for EV projects will likely increase the average energization timeline.**

During the March 31 public workshop, the Joint IOUs identified that their current average timelines for installing EV charging infrastructure under the existing service

PG&E AL 6607-E, SCE AL 4803-E, SDG&E AL 4011-E, BVES AL 444-E,  
Liberty AL 192-E, PacifiCorp AL 685-E /MTX

extension Rules (Rule 16)<sup>7</sup> generally range from 150 to 155 business days for steps under the IOUs direct control.

Under Rule 16, the responsibility of civil construction work, which includes excavation, conduit, and substructures, are assigned to the customer. However, the EV Infrastructure Rules assign the responsibility for all civil construction work, under the definition of electric distribution infrastructure<sup>8</sup> work, to the IOUs. The Joint IOUs assert that this is a signification change in responsibility as civil construction work can be complex and could increase the baseline energization timeline average by 25 to 35 business days, or from the current 150 to 155 business day average to 175 to 180 business days.

**2. The IOUs will need time to implement processes proposed to help expedite the service energization timeline.**

The Joint IOUs state they are currently working to implement the processes to manage EV Infrastructure Rule projects. Some IOUs are planning to devote dedicated internal or third-party resources for EV Infrastructure Rule projects, and ramping up these teams will require time, as will fully developing EV Infrastructure Rule processes and procedures. The Joint IOUs claim more time is required to develop these teams, which may initially raise the average timeline for EV Infrastructure Rule projects. They argue the proposed 160-business day average target will provide the IOUs the time required to develop these processes while still complying with a consistent average service energization target for EV Infrastructure Rule work.

**3. The current EV market does not produce a predictable volume of “construction-ready” work to justify a more aggressive timeline.**

The Joint IOUs assert that construction can only begin on an EV Infrastructure Rule job that is deemed “construction ready,” which they define as a project that 1) has executed contracts, 2) has all necessary land rights, 3) has acquired all necessary permits, and 4) has planned all necessary IOU procedures to ensure electric system safety, worker safety, and public safety.

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<sup>7</sup> While PacifiCorp’s service line extension work is included in their Rule 15, we will continue to cite to Rule 16 when referring to the Joint IOUs’ service line extension Rules.

<sup>8</sup> Section 740.19(b) defines electric distribution infrastructure as “poles, vaults, service drops, transformers, mounting pads, trenching, conduit, wire, cable, meters, other equipment as necessary, and associated engineering and civil construction work.”

PG&E AL 6607-E, SCE AL 4803-E, SDG&E AL 4011-E, BVES AL 444-E,  
Liberty AL 192-E, PacifiCorp AL 685-E /MTX

The Joint IOUs note that the proposed 160-business day average service energization timeline does not include steps for which customers and AHJs are responsible, including AHJ issuing permits and customers providing signed easements. The Joint IOUs assert that it is common for many applications to sit in the construction phase for several months before they are “construction-ready”<sup>9</sup> because of an outstanding dependency. Additionally, since the EV market is still in a nascent state, a stable process to support the energization life cycle has not yet been defined by IOU and non-IOU market participants.

For instance, the Joint IOUs highlight that permit agencies are responsible for critical path activities necessary for energization, with data from PG&E’s service territory showing that approximately 24 percent of the projects built in 2021 took over a year to become “construction ready” after the contract with the customer and the IOU was executed and approximately 25 percent took between six months to a year, mainly due to delays outside the IOU control, including delays in permit issuance, easement language negotiations, and other reasons.

The Joint IOUs assert that a moderate timeline provides predictability for customers in the near-term, and time for the EV market to mature and produce the volume of “construction-ready” work needed to support a more aggressive timeline.

Identify the processes that are within the IOUs’ direct and indirect control, and processes not within the IOUs’ control

The Joint IOUs’ proposal requests that the average numerical target adopted by the CPUC only apply to steps in the energization lifecycle which the IOUs are solely responsible. The Joint IOUs state this will ensure that the IOU timeline is transparent, predictable, and trackable. The Joint IOUs also note that the CPUC does not govern customers, AHJs, and EVSPs, and thus do not have the same regulatory expectation or oversight to ensure an enforceable timeline is met. Thus, including steps in the average service energization timeline that are not under the IOUs’ direct control would not be reasonable.

The Joint IOUs provide the following table to indicate which steps are and are not under their direct control, and thus are included in the average service energization

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<sup>9</sup> The IOUs define “construction ready” work as projects that have executed contracts, all necessary land rights, all necessary permits, all necessary utility procedures are planned to ensure electric system safety, worker safety, and public safety.

PG&E AL 6607-E, SCE AL 4803-E, SDG&E AL 4011-E, BVES AL 444-E,  
Liberty AL 192-E, PacifiCorp AL 685-E /MTX

numerical target. Steps marked “Yes” are included in the proposed service energization numerical target.

#	Energization Steps	Included in Target?
1	Customer submits site inquiry	No
2	IOU performs preassessment/engineering study	No
3	Customer reviews site feasibility study and submits all required information	No
4	IOU executes preliminary design	Yes
5	Customer approves or declines preliminary design	No
6	IOU finalizes design and delivers contract to customers	Yes
7	IOU creates and submits easement documents and AHJ permit requests	Yes
8	Customer and IOU completes Pre-Construction Field Meeting	No
9	Customer delivers easement signatures and signed contracts to IOUs, and AHJs issue requested permits	No
10	Customer completes all onsite work and applicable inspections	No
11	IOU schedules and completes civil construction work	Yes
12	IOU schedules and completes electric construction work	Yes

The Joint IOUs’ AL acknowledges that performing the preassessment and engineering study is an IOU task, but is excluded from the proposed 160 days average service energization timeline because the preassessment step requires customers to provide significant amounts of information to the IOU.

The Joint IOUs further state that projects with long lead times, including projects that exceed 2 MW, projects that trigger upstream capacity upgrades that must go through Rule 15, and projects that require substation upgrades, may delay energization of EV charging projects. Further, these types of projects may not take service under the EV Infrastructure Rules and are thus excluded from the proposed average service energization timeline.

Propose a process for how the IOUs can improve the service energization timing for items that are within their direct and indirect control

The Joint IOUs’ AL states that the Joint IOUs are actively working to improve new service timelines for EV customers, and in many cases either have, are in the process of, or are exploring opportunities to address the feedback stakeholders provided to help expedite the process. Specifically, the Joint EV Industry’s informal post-workshop comments provided recommendations for the Joint IOUs to consider, including:



PG&E AL 6607-E, SCE AL 4803-E, SDG&E AL 4011-E, BVES AL 444-E,  
Liberty AL 192-E, PacifiCorp AL 685-E /MTX

- Establishing a single point of contact for EV infrastructure requests;
- Developing a process or a tool to help improve transparency and communication;
- Improving capacity maps to include available load serving capacity;
- Revisiting the easement requirements to help streamline the process;
- Developing clearly defined requirements and/or obligations for customers; and
- Establishing standards for engineering reviews.

Include a description of how the IOU can contribute towards improving the timing for other responsibilities, if any

The Joint IOUs' proposal identifies areas outside of their direct control that they can support to improve the service energization process, including:

- Requesting forecasts of future charger deployment from the large EVSP and EV fleet customers.
  - The Joint IOUs state requesting forecast of future charger deployment from customers will help the IOUs plan future infrastructure deployments and have the necessary internal resources in place to timely serve new EV Infrastructure Rule applications as they are submitted.
- Educating local governments and other AHJs about the expected future growth of EV charging deployments and required permitting.
  - The Joint IOUs state that some IOUs are actively contributing to efforts by GO-Biz to speed local permitting processes.
- Assigning a consistent, standardized premise addresses to each site.
  - The Joint IOUs claim assigning a consistent premise address to each site will help EV charging projects comply with local jurisdiction address formatting requirements.
- Strengthening internal supply management practices to secure required equipment and materials.
  - The Joint IOUs state strengthening internal supply management practices will help customers better understand their needs early in the process to mitigate some challenges with delivery of materials.

PG&E AL 6607-E, SCE AL 4803-E, SDG&E AL 4011-E, BVES AL 444-E,  
Liberty AL 192-E, PacifiCorp AL 685-E /MTX

Ensure the proposal is reflective of the discussions and feedback from the workshop, including the feedback of industry representative

The Joint IOU AL identifies a number of ways that they considered the informal recommendations from Amply, Electrify America, and the Joint EV Industry, and some, but not all of the IOUs, have made some of the following, non-exhaustive list of improvements:

- Assigning dedicated IOU design and project management resources to EV projects.
  - The Joint IOUs state dedicating resources to the EV Infrastructure Rule implementation will allow IOU staff to specialize in EV projects and build ongoing relationships with major EV charging customers, and the IOUs plan to continue increasing the number of design staff assigned to EV Infrastructure Rules work as the number of customers requesting service under the Rules increases.
- Improving public communication of IOU timeline and requirements.
  - The Joint IOUs provide examples to improve public communication of IOU timelines and requirements that include PG&E's efforts to publish its EV Journey Map<sup>10</sup> to outline the key steps in the process to ensure clear understanding of responsibilities and utility target timelines, where applicable to utility-owned responsibilities. SCE is additionally developing a factsheet and welcome package for customers to help increase awareness around responsibilities, requirements, and timelines.
- Actively working to increase the accessibility of and information provided by the Interconnection Capacity Analysis maps.
  - The Joint IOUs provide an example of SDG&E currently sharing its capacity mapping data to help inform customers on the optimal grid locations for at scale charging infrastructure.
- Considering opportunities to expedite the easement process.
  - The Joint IOUs cite to examples of expediting the easement process that include PG&E's offering of pre-approved easement language to customers to avoid any potential delays in securing land rights. They additionally

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<sup>10</sup> The EV Journey Map can be accessed at PG&E's EV program and resources page: [https://www.pge.com/en\\_US/small-medium-business/energy-alternatives/clean-vehicles/ev-charge-network/electric-vehicle-charging/electric-vehicle-programs-and-resources.page?](https://www.pge.com/en_US/small-medium-business/energy-alternatives/clean-vehicles/ev-charge-network/electric-vehicle-charging/electric-vehicle-programs-and-resources.page?)

PG&E AL 6607-E, SCE AL 4803-E, SDG&E AL 4011-E, BVES AL 444-E,  
Liberty AL 192-E, PacifiCorp AL 685-E /MTX

cite to SCE's efforts to update its processes to provide customers with a sample easement document earlier in the project lifecycle and plans to allow customers to prepare/provide certain components of the easement materials (i.e., legal description and exhibits) to help expedite the process.

- Conducting regular meetings with major EVSP customers.
  - The Joint IOUs state that some IOUs currently host recurring meetings with many of the major EVSP customers on a biweekly or monthly basis to improve communication and inform them about new service processes, helping customers plan their applications and avoiding miscommunications.
- Establishing standards for when the IOU engineering review of the distribution system impacts are required.
  - The Joint IOUs provide an example of establishing engineering review standards through SCE having a system in place that allows for projects with less than 500 kilowatts to bypass an engineering review, in locations where there are not capacity constraint concerns.

The Joint IOUs note that while they have or are in the process of taking steps to address numerous stakeholder recommendations, there are some recommendations that the IOUs are unable to address for various reasons. The Joint IOUs specifically state that they are unable to address the stakeholder recommendation for the IOUs to adopt specific timeframes for certain tasks. The Joint IOUs assert they discussed this recommendation internally but concluded that they could not include it within the average service energization timeline as the IOUs' processes often include time needed to notify impacted customers of potential outages, and that the IOUs must retain a focus on safety and compliance with California's regulatory requirements as they work to expedite their processes.

## NOTICE

Notice of AL 4011-E was made by publication in the CPUC's Daily Calendar. SDG&E states that a copy of the AL was mailed and distributed in accordance with Section 4 of General Order 96-B.

PG&E AL 6607-E, SCE AL 4803-E, SDG&E AL 4011-E, BVES AL 444-E,  
Liberty AL 192-E, PacifiCorp AL 685-E /MTX

## **PROTESTS**

On June 16, 2022, ChargePoint, Inc., Electrify America, LLC, EVgo Services, LLC, and Tesla, Inc. (collectively, *Joint EV Industry*), submitted a joint protest to the Joint IOU AL.

The Joint EV Industry's protest states that the IOUs were clearly directed to "propose a numerical target (i.e., number of business days) for average energization time that reflects efforts to accelerate the current average service energization timeline." The Joint EV Industry argues that the Joint IOUs' proposal of 160 business days for energization, does not achieve this goal, nor do the Joint IOUs propose steps to improve the energization timelines for customers.

On June 23, 2022, the Joint IOUs filed a reply to the Joint EV Industry Parties' protest.

## **DISCUSSION**

This section of the Resolution identifies how the CPUC disposes of the issues associated with the adoption of the Joint IOUs' average EV Service Energization Timeline.

**We find that the Joint IOUs' average service energization timeline proposal requires modification in order to align with OP 8 of Resolutions E-5167 and E-5168.**

The Joint IOUs' proposal requests to establish a 160-business day average service energization timeline for projects going through the EV Infrastructure Rules, which only includes the time for the IOUs to complete tasks that are directly within the IOUs' control.

The Joint EV Industry's protest argues the Joint IOUs' proposed 160-business day average timeline—which is at least 224 calendar days, or seven months—does not accelerate energization. The Joint EV Industry suggests that the CPUC re-evaluate the proposed number to better reflect the IOUs current average service energization timeline under each IOUs' Electric Rule 16,<sup>11</sup> which ranges from an average of 150 to 155 business days.

The Joint EV Industry disagrees with the Joint IOUs' claim that the lack of a predictable volume of construction-ready work that will go through the EV Infrastructure Rules

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<sup>11</sup> PacifiCorp does not have an Electric Rule 16, however, their Electric Rule 15 covers distribution and service line extensions.

PG&E AL 6607-E, SCE AL 4803-E, SDG&E AL 4011-E, BVES AL 444-E,  
Liberty AL 192-E, PacifiCorp AL 685-E /MTX

justifies a less aggressive service energization timeline. The Joint EV Industry asserts that the volume of construction ready work *is* predictable, and that the IOUs should anticipate the amount of utility-side work performed under the EV Infrastructure Rules, as well as work performed to support other state and federal transportation electrification (TE) initiatives, will increase. The Joint EV Industry asserts the predictable increase in work under the EV Infrastructure Rules justifies a more aggressive timeline in order to not fall behind in meeting California's EV goals and to keep pace with EV charging demand.

The Joint EV Industry recommends that the CPUC adopt a 90-business day average service energization timeline as a near-term target but recommends that if the CPUC were to reject the 90-business day recommendation, that the minimum approved service energization timeline be no longer than the current average of 150 to 155 business days.

The Joint EV Industry also recommends the CPUC adopt a concurrent process to evaluate the IOUs' ability to meet a 90-business day average service energization target to inform a permanent target. They recommend this evaluation include an IOU-led public workshop within twelve-months of approval of the interim target to:

- Provide an update on the IOUs' progress on various issues that stakeholders identified as key to accelerating the service energization process, including easements, staffing, hosting capacity map improvements, inspection consistency, etc.;
- Provide an evaluation of the current state of the service energization timelines and progress needed to achieve the lower bound of the target timeline of 90-business days; and
- Provide next steps on how the IOUs will continue to accelerate the service energization process.

The Joint IOUs refute the Joint EV Industry's claim that the 160-day target does not comply with the Resolutions' direction to accelerate energization timelines, as the Resolutions required the timeline to be between 90 and 160 days. The Joint IOUs state the proposed timeline reflects efforts to accelerate the current timelines, while also accounting for new utility-side responsibilities that are not included in the scope of the data to which the Joint EV Industry refers, such as additional civil construction work.

PG&E AL 6607-E, SCE AL 4803-E, SDG&E AL 4011-E, BVES AL 444-E,  
Liberty AL 192-E, PacifiCorp AL 685-E /MTX

The Joint IOUs assert the proposed 160-day energization average timeline that excludes days of customer responsibility, permitting, and any required Rule 15 work is reasonable and represents an improvement over the status quo when accounting for the additional utility civil construction work. This additional work that the EV Infrastructure Rules require adds approximately 25 to 30 days to the energization timeline. The Joint IOUs argue that the Joint EV Industry's recommended 90-day average timeline is not based on any facts that can demonstrate the IOUs are able to meet this timeline. The Joint IOUs urge the CPUC to reject the Joint EV Industry's 90-day average timeline, and rather encourage the IOUs to continue to take appropriate steps to streamline and accelerate their processes.

In response to the Joint EV Industry's recommendation for the CPUC to establish a near-term target and have an evaluation of the energization timeline within eighteen months to potentially adjust it, the Joint IOUs recommend the CPUC conduct both the initial informal evaluation and the public workshop within twelve-months of the approval of the Joint IOUs' AL.

We agree with the Joint EV Industry that the Joint IOUs' proposed 160-business day average does not align with the goal established in Resolutions E-5167 and E-5168. Ordering Paragraph 8 of Resolutions E-5167 and E-5168 directed the Joint IOUs to demonstrate that the IOUs are taking steps to accelerate the service energization process in their proposal.

We are not persuaded by the Joint IOUs assertion that the additional responsibility of civil construction added to the direct utility-role under the EV Infrastructure Rules will add an additional 25-30 days to the energization process. While the IOUs may need to develop their internal processes to ensure the timely completion of this work under the EV Infrastructure Rules, they have nearly six-years of experience implementing civil construction work within their approved behind-the-meter TE programs. These efforts to implement their behind-the-meter TE programs are factored in the Joint IOUs' current 150 to 155-business day average service energization timeline. As this step is now included within the IOUs' direct control rather than a potentially inexperienced customer's control, we expect the Joint IOUs, by leveraging their previous experience implementing behind-the-meter TE programs and achieving economies of scale, will be able to improve upon the 25-30 days they assert an individual customer needs to complete this work.

PG&E AL 6607-E, SCE AL 4803-E, SDG&E AL 4011-E, BVES AL 444-E,  
Liberty AL 192-E, PacifiCorp AL 685-E /MTX

In response to the Joint EV Industry's recommended a 90-day service energization average, we find it is too premature to adopt such an aggressive target. The CPUC does not have sufficient data that can support the Joint EV Industry's assumption that the Joint IOUs can achieve such an aggressive numerical target. Additionally, while we cannot justify adopting an average 90-day service energization average target, we do find the Joint IOUs' proposed 160-business day average to not meet the intent of Resolutions E-5167 and E-5168, which direct the Joint IOUs to propose a timeline that demonstrates efforts to accelerate the service energization process to support the state in meeting its aggressive EV goals and targets. Until the CPUC has more data to determine how aggressive the service energization target should be, we believe it is reasonable to adopt an interim target based on the middle ground between the Joint EV Industry's proposed 90-business day average and the Joint IOUs' 160-business day average.

**We modify the proposed average service energization timeline to adopt a temporary average of 125-business days for all projects that go through the IOUs' EV**

**Infrastructure Rule.** We believe a 125-business days service energization average target, starting from when a customer submits an application for service through the EV Infrastructure Rules to the energization of the EVSE, balances the Joint EV Industry's recommended 90-day target, and the Joint IOUs proposed 160-day target, and signals the intent for the IOUs to improve current practices while still acknowledging the growing state of the market. This modified target aligns with the CPUC's directives in E-5167 and E-5178 for the IOUs' timeline to reflect efforts to accelerate the service energization process. As the current timeline for Rule 16 projects achieves a 150-155 business day average, this Resolution's adoption of a 125-business day target achieves this objective.

**We direct the IOUs to record the reason(s) for all delays and the number of days each project exceeded the 125-business day average within their EV Infrastructure Rule**

**data collection reports.** While we adopt a more aggressive timeline than the Joint IOUs propose, we are cognizant of the lack of data to support either the Joint EV Industry's recommendation or the Joint IOUs' proposal. To ensure the CPUC has sufficient data to adopt a permanent average energization timeline, for each project that exceeds the 125-business day average timeline, the IOUs shall record the reason(s) for all delays and the number of days each project exceeded the 125-business day average within their EV Infrastructure Rule data collection reports. The Joint IOUs shall file a joint T2 AL within

PG&E AL 6607-E, SCE AL 4803-E, SDG&E AL 4011-E, BVES AL 444-E,  
Liberty AL 192-E, PacifiCorp AL 685-E /MTX

twelve months from the date of adoption of this Resolution to propose an updated average service energization target informed by EV Infrastructure Rules' implementation data. As implementation of the IOUs' EV Infrastructure Rules began in April 2022, the IOUs will have nearly two years of implementation data to inform an updated service energization timeline.

Prior to submitting their joint T2 AL, the Joint IOUs shall host a public workshop to discuss the following:

1. Present data on the Joint IOUs' progress towards meeting the 125-business day service energization timeline;
2. Discuss the outstanding barriers toward accelerating the service energization timeline, including any issues with easements, staffing, capacity map improvements, inspection consistency;
3. Discuss the Joint IOUs' progress toward overcoming the barriers to accelerate the service energization timeline;
4. Present the Joint IOUs' recommendations for updating the service energization timeline, including the proposed number of days, and the energization process steps that are included in the timeline.

**We limit the scope of the adopted average service energization timeline to only apply to EV Infrastructure Rule projects, excluding projects that exceed 2MW and projects that require a customer to take service through an additional Electric Rule.** The Joint IOUs' proposal requests that the adopted average service energization timeline only apply to projects receiving service through the EV Infrastructure Rules. They additionally request that the timeline exclude projects that exceed 2MW, projects that require upstream capacity upgrade through Rule 15, and projects that require a substation upgrade. The Joint IOUs argue that while they are working to ensure the electric grid is ready to accommodate the anticipated increase in EV charging load over the next few years, projects such as these have long lead times that may delay the energization of EVSE. They additionally argue that the EV Infrastructure Rules only apply to work associated with the service extensions resulting from the IOUs' line



PG&E AL 6607-E, SCE AL 4803-E, SDG&E AL 4011-E, BVES AL 444-E,  
Liberty AL 192-E, PacifiCorp AL 685-E /MTX

extensions, and thus, the time required to complete any distribution work should be excluded from the average service energization timeline.<sup>12</sup>

As some customers and third-party EVSPs may choose to continue to utilize the IOUs' Rule 16 in lieu of the EV Infrastructure Rules, the Joint EV Industry recommend applying the average service energization timeline to all customers installing EV charging, regardless of the Rule they take service through. The Joint EV Industry asserts this will help customers better understand the additional time associated with the additional civil work scope component of the EV Infrastructure Rules.

We agree with the Joint IOUs that projects exceeding 2MW, projects that trigger upstream capacity upgrades via Rule 15, and projects that require substation upgrades are outside the scope of the EV Infrastructure Rules. These projects will require long-lead times to plan and construct, and as such we do not include these projects within in the adopted average service energization timeline at this time.

While we grant this exemption, we find merit in the IOUs performing additional data collection on these projects. The IOUs shall record standardized data within their EV Infrastructure Rule data reporting to reflect the timelines to energize EVSE that has more than 2MW of capacity installed, goes through the IOUs' Rule 15, goes through any other Electric Rule, and projects that require a substation upgrade. The CPUC may later determine an average service energization timeline is needed for these efforts, which the collected data may help inform.

**We modify the proposed EV Infrastructure Rule steps within the service energization timeline process to include permitting limited to the statutory timeline adopted in AB 1236 and AB 970 and to track delays affecting this timeline.**

The Joint EV Industry recommends that while it falls outside of the IOUs' direct and indirect control, the CPUC should incorporate the AHJ permit review periods into the average service energization timelines, as the IOUs' proposal currently does not consider this process. The Joint EV Industry states that with the passage of AB 1236

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<sup>12</sup> The Joint IOUs' EV Infrastructure Rules are optional alternatives for customers installing EV charging infrastructure to the IOUs' Rule 16 Service Line Extension. A customer taking service through the EV Infrastructure Rule may still need to take service through the IOUs' Rule 15: Distribution Line Extension if their EV Infrastructure Rule project triggers an upgrade. While work performed under the EV Infrastructure Rules and Rule 16 services a single service point only, Rule 15 work serves multiple service points to support individual customer's service line extensions.

PG&E AL 6607-E, SCE AL 4803-E, SDG&E AL 4011-E, BVES AL 444-E,  
Liberty AL 192-E, PacifiCorp AL 685-E /MTX

(Chiu, 2015)<sup>13</sup> and AB 970 (McCarty, 2021)<sup>14</sup> the Joint IOUs will be able to incorporate the time it takes to attain the necessary permits to install and energize an EVSE within the average service energization timeline. The Joint EV Industry argues that as AB 970 deems a permit complete within 5-business days and deemed approved within twenty-five business days the Joint IOUs can now develop steps to advance the utility-side planning and/or construction while a permit is pending completion/approval.

The Joint IOUs express their appreciation for the efforts by state lawmakers to accelerate the EV permitting process via AB 1236 and AB 970 but assert including permitting into the EV Infrastructure Rule timeline as premature. The Joint IOUs argue that AB 970 was only signed by the Governor in October 2021, and it remains unclear what impact the law will have on permitting timelines. Moreover, the maximum of 40-business days for EVSE permitting that AB 970 directs is approximately 56 calendar days, over three-fifths of the 90-calendar-day average service energization timeline requested by the Joint EV Industry. Joint IOUs argue that including permitting within the average service energization timeline will leave an unreasonable two-fifths of the timeline to the Joint IOUs to accomplish all other IOU responsibilities.

We agree with the Joint EV Industry that the passage of AB 1236 and AB 970 creates an enhanced level of certainty for when a permit will be issued for the installation of an EVSE. As previously stated, AB 970 requires a permit automatically be deemed complete within 5 or 10 business days and deemed approved within 20 or 40 business days, unless the AHJ has issued a written correction notice detailing deficiencies in the application, made a finding that the EVSE installation would have a specific adverse

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<sup>13</sup> Codified in Government Code Section 65850.7, requires all California cities and counties to develop an expedited, streamlined permitting process for EV charging stations (EVCS). All cities and counties are required to adopt a streamlining ordinance and checklist for EVCS permit approvals. Compliance with AB 1236 can be found [here](#).

<sup>14</sup> Codified in Government Code Section 65850.71, requires jurisdictions to limit EVCS project review to health and safety requirements, and adds specific binding timelines to review period based on the size of the project. A site with 1-25 EVSE will be deemed complete after 5 business days pending review for 1) application completeness, 2) permit applicant was issued a written deficiency notice that a) details all changes needed to make the application consistent with the city or county EVSE permitting checklist, or b) identifies specific information necessary for the Building Official to conduct a limited review of whether the project meets all health and safety requirements. If not already approved or denied, the site will be deemed approved within 20 business days after it was deemed complete if 1) the city or county has not made a finding that the EVSE could have a specific adverse impact upon the public health or safety, 2) the city or county has not required the applicant to apply for a use permit specified in Section 65850.7(b), and 3) an appeal has not been made to the planning commission pursuant to Section 65850.7(d). Sites with 26 or more EVSE installations will be deemed complete after 10 business days and deemed approved 40 business days after deemed complete.

PG&E AL 6607-E, SCE AL 4803-E, SDG&E AL 4011-E, BVES AL 444-E,  
Liberty AL 192-E, PacifiCorp AL 685-E /MTX

impact upon the public health or safety, or required the applicant to apply for a non-streamlined permit due to the project scope. While the permitting process may fall outside of the IOUs' direct and indirect control, the statutory direction that a permit shall be approved or deemed approved within 25- or 50-business days allows the IOU to prepare for work on other steps requiring an approved permit that could otherwise be delayed indefinitely. Due to the certainty AB 970 sought to create regarding the maximum time for a permit to be approved, the average service energization timeline shall include the 25- or 50-business day maximum time for a permit to be deemed approved.

However, we acknowledge that AB 970 lacks a clear enforcement mechanism, which may result in an AHJ not issuing notice of a permit's approval or rejection within the legislatively required timeline. While AB 970 stipulates that a permit be automatically deemed approved once the 25- or 50-business days have passed, we recognize the EVSP, IOU, and customer may be risk-adverse, and continue to wait for an AHJ to provide notice of the permit's approval or rejection before moving forward with the post permit tasks. Therefore, if an AHJ does not provide notice of a permit's status to a customer within the legislatively required 25- or 50-business days, any days that exceed that period shall not count toward the adopted 125-business day service energization average. Within their service energization data reporting efforts, the IOUs must record data on each project that exceeds the 25- or 50-business days needed for a permit, including 1) the number of days exceeding 25- or 50-business days, 2) the reason for the delay, as provided by the customer, and 3) what steps, if any, the IOU took to help remedy the delay for permit issuance.

Table 1 below outlines the updated applicability of the energization timeline we adopt in this Resolution:

Table 1 – Energization Steps Included in the Energization Timeline

#	Energization Steps	Included in Target?
1	Customer submits site inquiry	No
2	IOU performs preassessment/engineering study	No
3	Customer reviews site feasibility study and submits all required information	No
4	IOU executes preliminary design	Yes
5	Customer approves or declines preliminary design	No

PG&E AL 6607-E, SCE AL 4803-E, SDG&E AL 4011-E, BVES AL 444-E,  
Liberty AL 192-E, PacifiCorp AL 685-E /MTX

6	IOU finalizes design and delivers contract to customers	Yes
7	IOU creates and submits easement documents and AHJ permit requests	Yes
8	Customer and IOU completes Pre-Construction Field Meeting	Yes
9	Customer delivers easement signatures and signed contracts to IOUs, and AHJs issue requested permits	Yes, up to 25- or 50- business days
10	Customer completes all onsite work and applicable inspections	No
11	IOU schedules and completes civil construction work	Yes
12	IOU schedules and completes electric construction work	Yes

**The Joint IOUs shall each, at minimum, develop materials that clearly illustrate the service energization steps that are the direct responsibility of the IOU, the customer, the EVSP, the AHJ, and any other party involved in the energization process *and make it easily accessible on their website*. The IOUs shall record any costs associated with developing this material in their respective EV Infrastructure Rule Memorandum Accounts.**

The Joint IOU AL provides examples of PG&E and SCE developing materials to improve public communication of the IOUs' service energization timeline and requirements. These efforts include PG&E publishing its EV Journey Map on its website, which outlines the key steps in the service energization process with the goal to provide customers a clear understanding of the responsibilities and targets for receiving service through the EV Infrastructure Rule. SCE is also taking steps to develop a factsheet and welcome package to increase awareness around the responsibilities, requirements, and timelines for customers taking service through the EV Infrastructure Rule.

We find PG&E's and SCE's efforts to improve customer understanding of the responsibilities and timelines for receiving service through the EV Infrastructure Rule as an essential service that each of the Joint IOUs should implement. The Joint IOUs shall each, at minimum, develop materials that clearly illustrate the service energization steps that are the direct responsibility of the IOU, the customer, the EVSP, the AHJ, and any other party involved in the energization process. The Joint IOUs shall ensure each

PG&E AL 6607-E, SCE AL 4803-E, SDG&E AL 4011-E, BVES AL 444-E,  
Liberty AL 192-E, PacifiCorp AL 685-E /MTX

step has a clear explanation for why the step is necessary, the process to complete the step, and an estimated timeframe to complete the step. The IOUs shall make the material readily available for all customers to access on their webpages, and specifically for a customer submitting an application for service through the EV Infrastructure Rule. The IOUs shall record any costs associated with developing this material in their respective EV Infrastructure Rule Memorandum Accounts.

**We defer addressing Interconnection Capacity Analyses (ICA) map updates to R.21-06-017 but direct the Joint IOUs to provide relevant grid information to customers during the preassessment step, and, within their joint T2 AL filing, an update on their ability to implement the Load ICA updates ordered in R.21-06-017 on an expedited timeline.**

The Joint IOU AL provides an example of the steps the IOUs are taking to improve the accessibility of information related to local grid conditions and a site's capacity to install EV charging infrastructure. Specifically, the Joint IOU AL states SDG&E is currently sharing its Interconnection Capacity Analyses (ICA) map data with customers to help inform the optimal grid locations for at scale charging infrastructure.

The Joint EV Industry supports the steps the Joint IOUs are taking to improve accessibility and visibility of their ICA maps. The Joint EV Industry further recommends each IOU update their ICA maps on a quarterly basis to allow EVSPs to see available load service capacity at the substation and circuit level (accounting for queued capacity), feeder identification and characteristics, substation source, voltage information, other information regarding transformer locations and load, and other "last-mile" grid information.<sup>15</sup>

The Joint IOUs did not respond to the Joint EV Industry's recommendation to update their ICA maps.

While we agree with the Joint EV Industry that improved, more accessible ICA maps will provide essential information to customers, EVSPs, and other non-IOU stakeholders to enable customers to come to the IOU with a more complete site plan, we recognize that these improvements are within scope in R.21-06-017. In their comments on the draft Resolution, the Joint IOUs each correctly note that several of the Joint EV Industry's recommendations duplicate with efforts in R.21-06-017, and specifically, the

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<sup>15</sup> Joint EV Industry Informal Comments at 7

PG&E AL 6607-E, SCE AL 4803-E, SDG&E AL 4011-E, BVES AL 444-E,  
Liberty AL 192-E, PacifiCorp AL 685-E /MTX

orders provided in a September 9, 2021, Assigned Law Judge (ALJ) Ruling Ordering Refinements to Load ICA maps.<sup>16</sup>

To prevent any further delay in implementing modeling changes to the Load ICA map, the September 9, 2021, ALJ Ruling directs the IOUs to begin adopting the following modeling changes to Load ICA, which were not completed in 2022:

1. Modeling load ICA with all queued load projects and planned, known, near-term distribution system projects;
2. Model load ICA to include distribution system upgrades with an approved construction schedule and an in-service date within one year;
3. Model load ICA to consider forecasted Distributed Energy Resources (DER) growth;
4. Model load ICA to consider planned network reconfiguration; and
5. Model load ICA with load forecast for the next year.

Additionally, the R.21-06-017 Scoping Memo<sup>17</sup> outlined near-term actions that will be addressed in Phase 1 of the proceeding. These near-term actions include a number of measures to improve grid-need transparency, including a question that ask “How should ICA data and calculations be improved to enhance accuracy and usefulness for DER planning, siting, and interconnection, especially with respect to electrification load?” and “How can the Grid Needs Assessment (GNA)/Distribution Deferral Opportunity Reports better reflect the types of TE investments identified in the draft Transportation Electrification Framework and the legislative directives from AB 841?”.

A Proposed Decision addressing these outstanding questions scoped into Phase 1 of R.21-06-017 is expected in 2023, therefore, we remove the draft Resolution’s direction for quarterly updates and instead defer further directives to improve the Joint IOUs’ ICA maps to R.21-06-017.

Still, we direct the utilities to, upon the request of the customer, incorporate relevant information accessible in the currently available tools: Load ICA, Generation ICA, and GNA Data Portals as part of the preassessment step of the service energization process.

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<sup>16</sup> <https://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M405/K069/405069132.PDF>

<sup>17</sup> See R.21-06-017 Scoping Memo at <https://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M422/K949/422949772.PDF>

PG&E AL 6607-E, SCE AL 4803-E, SDG&E AL 4011-E, BVES AL 444-E,  
Liberty AL 192-E, PacifiCorp AL 685-E /MTX

Finally, in recognition of the importance of the Load ICA map improvements on the energization process, we direct the Joint IOUs to include in their upcoming service energization average update joint T2 AL, a description of their ability to implement some or all of the planned R.21-06-017 Load ICA improvements ahead of schedule for individual circuits or line sections on an as needed basis at the request of a customer. We believe the ability of implementing this interim step will provide improved essential grid data to customers planning to install TE infrastructure and will reduce the impact of the long-lead time of updates directed in R.21-06-017.

**We decline to adopt a standard easement process for the Joint IOUs to follow but encourage all of the IOUs to take efforts that are either similar to those PG&E and SCE have taken, or to develop a new path to simplify and expedite the easement process.** The Joint IOU AL lists out examples of the steps the IOUs are taking to improve service energization timelines that includes IOU consideration of opportunities to expedite the easement process.<sup>18</sup> Specifically, the Joint IOUs identify steps SCE is taking to update its processes to provide customers with a sample easement document earlier in the project lifecycle and SCE's plans to allow customers to prepare and/or provide certain components of the easement materials to the IOU to help expedite the process. Another highlights PG&E's efforts to provide pre-approved easement language to customers to avoid any potential delays in securing land rights.

The Joint EV Industry applaud PG&E's leadership in streamlining the easement process and encourage the other IOUs to adopt PG&E's easement streamlining efforts, which can be inserted in third-party site host agreements instead of the easement process. The Joint EV Industry asserts this language will allow customers and the IOU to bypass a protracted negotiation process on often inflexible utility easement language. It would enable EVSPs and site hosts to more easily contract and deploy EVSE, which has the potential to significantly reduce delays in the energization process.<sup>19</sup> EVgo also supports easement reforms, noting that IOUs only initiate the easement and permitting process after finalizing an IOU design plan.<sup>20</sup>

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<sup>18</sup> An easement gives the holder (i.e., IOU) the right to use the property of a property's owner (i.e., customer, neighbor) without requiring the owner to sell the property. IOUs' typical use easements to have overhead or underground powerlines go through a customer's or neighbor's property without the IOU purchasing the land.

<sup>19</sup> Joint EV Industry Informal Comments at 5

<sup>20</sup> EVgo Informal Comments at 3

PG&E AL 6607-E, SCE AL 4803-E, SDG&E AL 4011-E, BVES AL 444-E,  
Liberty AL 192-E, PacifiCorp AL 685-E /MTX

We decline to adopt a standard easement process for the Joint IOUs to follow. While the Joint EV Industry's assertion that PG&E has been able to accelerate their service energization process by providing customers with a lease in lieu of easement language, the CPUC has not verified this assertion. While we are encouraged by PG&E's and SCE's efforts to improve the easement process and are optimistic these efforts will help to accelerate service energization timelines, we do not have sufficient data or knowledge of the process to establish a broad requirement for the Joint IOUs. We direct each IOU to develop processes that are either similar to those taken by PG&E and SCE, or a new path to simplify and expedite the easement process.

**We direct each IOU to conduct meetings with EVSP customers quarterly, at minimum, to improve communication.**

The Joint IOU AL states that some IOUs host recurring meetings with many of the major EVSP customers on a biweekly or monthly basis to improve communication and inform customers about the EV Infrastructure Rule processes.

We support the Joint IOUs current efforts to host recurring meetings with their major EVSP customers. Improving communication and information sharing between the customer and IOU is essential to ensuring the timely service energization of the EVSE. While monthly meetings may be unnecessary and burdensome, we direct each IOU to start conducting regular quarterly meeting with all major EVSP customers within their service territory on a collective basis to allow EVSPs to share lessons learned amongst the IOU and other EVSPs, improve communication and inform the customer about new service processes, help the customer plan their applications, and avoid miscommunications. The IOUs shall record all incremental costs associated with these efforts in their EV Infrastructure Rule Memorandum Accounts to seek recovery through their GRC.

**We direct the IOUs to record within their EV Infrastructure Rule data reporting all delays in processes that are under the IOUs' direct control that are impacted by factors outside of their control.**

The Joint IOUs note that there are some processes that are under the IOUs' control, but that cannot reasonably be conducted faster, such as utility construction timelines. The Joint IOUs cite to material shortages due to the ongoing global supply chain disruption that is outside of their control and may have impacts on the average timelines. They additionally cite to the need to avoid compromising safety or not complying with local



PG&E AL 6607-E, SCE AL 4803-E, SDG&E AL 4011-E, BVES AL 444-E,  
Liberty AL 192-E, PacifiCorp AL 685-E /MTX

regulations, such as Liberty being unable to conduct excavations during the winter months due to environmental regulations.

We acknowledge there are many factors that may appear to be within the IOU's control, but are delayed for an outside reason, such as safety requirements, local regulations, or supply chain issues. The IOUs shall continue to find ways to improve the energization timeline for items affecting steps within their control. The IOUs shall record any delays impacting steps within their direct control (i.e., provide the number of days a step was delayed, the reason for the delay, action taken to address delay, if any, etc.) within their EV Infrastructure Rule data reporting. Any incremental costs incurred by the IOUs during the collection and reporting of this data shall be recorded in their EV Infrastructure Rule Memorandum Accounts to seek recovery during their GRC.

**We defer judgement on the feasibility of implementing feedback collected from stakeholders to the Joint IOUs, but support efforts to incorporate further improvements into their service energization processes.**

The Joint IOUs assert the proposed average service energization timeline and processes listed above incorporate and reflect feedback from stakeholders provided during the March 28 public workshop and the informal comments submitted by parties after the workshop. The Joint IOUs note that they were unable to incorporate all the feedback into their proposal as some recommendations are infeasible to implement, including recommendations that the IOUs adopt specific timeframes for certain tasks. The Joint IOUs assert they discussed this recommendation internally but concluded that they could not include it within the average service energization timeline as the IOUs' processes often include times needed to notify impacted customers of potential outages, and that the IOUs must retain a focus on safety and compliance with California's regulatory requirements as they work to expedite their processes.

We agree with the Joint IOUs. While our goal is to accelerate the service energization process timeline, the CPUC's top priority is to ensure all safety and regulatory requirements are followed. These safety and regulatory requirements must not be compromised by our goal of accelerating EVSE energization. The Joint IOUs must ensure that they abide by all safety and regulatory requirements adopted by the Commission, in addition to all local, state, and federal requirements. Still, we direct the IOUs to continue to assess and provide updates on feedback collected from stakeholders to the Joint IOUs during the preparation of AL 4011-E in the workshop to

PG&E AL 6607-E, SCE AL 4803-E, SDG&E AL 4011-E, BVES AL 444-E,  
Liberty AL 192-E, PacifiCorp AL 685-E /MTX

be held twelve months after the approval of this Resolution.

### **Safety Considerations**

There are no incremental safety implications associated with approval of this Resolution. As this Resolution does not alter any process for energization, but only establishes expected timelines for IOU work, there is no direct impact to safety.

### **COMMENTS**

Public Utilities Code section 311(g)(1) provides that this Resolution must be served on all parties and subject to at least 30 days public review. Any comments are due within 20 days of the date of its mailing and publication on the Commission's website and in accordance with any instructions accompanying the notice. Section 311(g)(2) provides that this 30-day review period and 20-day comment period may be reduced or waived upon the stipulation of all parties in the proceeding.

The 30-day review and 20-day comment period for the draft of this Resolution was neither waived nor reduced. Accordingly, this draft Resolution was mailed to parties for comments and will be placed on the Commission's agenda no earlier than 30 days from today.

On November 30, 2022, the California Association of Small and Multi-Jurisdictional Utilities (CASMU), General Motors (GM), ChargePoint, Electrify America, EVgo, and Tesla filing jointly (Joint EV Industry), Pacific Gas & Electric (PG&E), San Diego Gas & Electric (SDG&E), and Southern California Edison (SCE) filed comments on this Resolution.

CASMU, PG&E, SCE, and SDG&E all assert that the 125-day timeline is not supported by the record and must be extended to account for the realities of the service energization process. They further oppose the inclusion of preassessments, engineering studies, and permitting within the required timeframe. Finally, they point to the requirement to perform quarterly updates to the ICA maps directed in the draft Resolution to be duplicative to efforts under way in R.21-06-017.

PG&E AL 6607-E, SCE AL 4803-E, SDG&E AL 4011-E, BVES AL 444-E,  
Liberty AL 192-E, PacifiCorp AL 685-E /MTX

The Joint EV Industry supports the 125-business day average service energization timeframe and the steps included in the timeframe, but recommends the Resolution provide further guidance on the topics that the IOUs should discuss and evaluate during the workshop that the IOUs will host in twelve months, specifically, the need for the IOUs to discuss potential staffing and contract resources necessary to meet the adopted timeline. They further oppose the exclusion of sites going through Rule 15 and Rule 16 from the service energization timeline and recommends the timeline should equally apply to all projects that install EV charging infrastructure. The Joint EV Industry also supports the requirement that the IOUs perform updates to their ICA maps, and recommends the final Resolution strengthen this requirement by clarifying that the IOUs share additional information with the EVSPs. Finally, the Joint EV Industry supports the requirement for the IOUs to conduct quarterly check ins with the EVSPs, but recommends clarifying that this requirement is intended to focus on larger group meetings with multiple EVSPs to allow for shared lessons learned and best practices to be discussed.

GM states its general support for the 125-buisness day average service energization timeline. GM recommends the final Resolution scope EV infrastructure projects that go through Rule 15 and Rule 16 into the adopted service energization timeline. Finally, GM recommends the Resolution direct the IOUs to include a discussion on labor constraints that play an important role in project timelines within the upcoming workshop on energization timelines.

PG&E supports the Resolution's exclusion of Rule 15 from the proposed service energization timeline. PG&E further recommends the Resolution provide authorization for the IOUs to record any incremental cost incurred from the additional data collection requirements in their EV Infrastructure Rule Memorandum Accounts. SCE requests clarification on when the IOUs are to jointly submit the AL to propose a permanent service energization timeline. CASMU oppose the requirement that the IOU host quarterly check-ins with the EVSPs, and instead recommend simply directing the EVSPs to provide a quarterly report to the IOU with expected EV Infrastructure Rule applications.

We reject the request modify the interim 125-business day average service energization timeframe directed in the draft resolution. We still believe that exceptions directed in this resolution for complex projects and the further modifications discussed below

PG&E AL 6607-E, SCE AL 4803-E, SDG&E AL 4011-E, BVES AL 444-E,  
Liberty AL 192-E, PacifiCorp AL 685-E /MTX

provide enough flexibility to the Joint IOUs while keeping the intention of continuous improvement of the energization timeline.

We agree with the Joint IOUs' proposal to not include preassessments and engineering studies within the average timeline. We are persuaded by the Joint IOUs explanation that the preassessment and engineering studies steps, while still in the IOU control, are not suitable to be included in the service energization timeline as this work is performed prior to a customer submitting their application and may not result in an application submission. We made edits to this Resolution to effect this change.

We are persuaded by the Joint IOUs' commenting stating that updates to Load ICA Maps directed in the draft resolution are duplicative of efforts currently under way in R.21-06-017. We added discussion in the body of the Resolution that removes this directive and instead directs the Joint IOUs to provide updates on their efforts to accelerate the implementation of these updates in the T2 AL to be filed 12 months after the adoption of the resolution. We see this as a signal of the importance of such updates to the timely energization of TE charging infrastructure.

Other modifications to this Resolution include edits to improve flow and correct typos and the following in response to comments:

- Limit the permitting process step to the timeline approved in AB 1236 and AB 970 to account for uncertainties in the implementation of the statute due to lack of enforcement.
- Clarify that IOUs should record the incremental costs incurred from the directives of this Resolution in their EV Infrastructure Rule Memorandum Accounts.
- Include discussions in the scope of the Resolution's ordered workshop on labor needs to support meeting the service energization timeline.
- Clarify the structure of the IOUs' quarterly check-ins with the EVSPs,
- Clarify the timing for when the IOUs are to file their joint T2 AL to propose an update to the service energization timeline.

PG&E AL 6607-E, SCE AL 4803-E, SDG&E AL 4011-E, BVES AL 444-E,  
Liberty AL 192-E, PacifiCorp AL 685-E /MTX

## **FINDINGS**

1. Ordering Paragraph 8(c) of Resolutions E-5167 and E-5168 directs PG&E, SCE, SDG&E, BVES, Liberty, and PacifiCorp to file a joint AL within 240 days of the Resolutions' approval to propose an average service energization timeline for sites installed via the EV Infrastructure Rules.
2. SDG&E timely filed Advice Letter 4011-E jointly with PG&E, SCE, BVES, Liberty, and PacifiCorp on May 27, 2022 to propose a 160-business day average service energization timeline for projects taking service through the EV Infrastructure Rule, and excluding projects that exceed 2MW, projects that require a substation upgrade, and projects that require customers to take service under additional Electric Rules.
3. On June 16, 2022, ChargePoint, Inc., Electrify America, LLC, EVgo, LLC, and Tesla Inc., collectively submitted a joint protest to AL 4011-E recommending the CPUC deny the proposed 160-business day average service energization timeline and adopt an interim 90-business day timeline that includes all projects taking service through the EV Infrastructure Rule, with no exceptions, and a twelve-month process to develop a permanent average service energization timeline.
4. On June 23, 2022, PG&E, SCE, SDG&E, BVES, Liberty, and PacifiCorp jointly filed a reply to the joint protest arguing against the recommendation for the CPUC to establish an interim 90-business day average service energization timeline.
5. PG&E, SCE, SDG&E, BVES, Liberty, and PacifiCorp achieved an average service energization timeline of 150 to 155 business days in 2021 for customers taking service under Rule 16.
6. The CPUC does not have sufficient data to determine an appropriate permanent average service energization timeline at this time.
7. It is reasonable to establish an interim average service energization timeline that is between the 90-business day and 160-business day proposals.
8. It is reasonable to direct PG&E, SCE, SDG&E, BVES, Liberty, and PacifiCorp to propose a new average service energization timeline that is informed by at minimum, 12-months of EV Infrastructure Rule implementation efforts.
9. AB 841 (Ting, 2020) includes civil construction work for EV projects in the definition of utility-side infrastructure to support EV charging.
10. PG&E, SCE, SDG&E, BVES, Liberty, and PacifiCorp have nearly six-years experience each implementing behind-the-meter TE programs that have the utility perform civil construction work.

PG&E AL 6607-E, SCE AL 4803-E, SDG&E AL 4011-E, BVES AL 444-E,  
Liberty AL 192-E, PacifiCorp AL 685-E /MTX

11. It is reasonable to direct PG&E, SCE, SDG&E, BVES, Liberty, and PacifiCorp to record the reasons for all delays and the number of days each project exceeds the adopted interim 125-business day average service energization timeline to inform potential modifications to the timeline.
12. It is reasonable to limit the scope of the adopted average service energization timeline to only apply to EV Infrastructure Rule projects, excluding projects that exceed 2MW, projects that require substation upgrades, and projects that require the customer take service through an additional Electric Rule.
13. It is reasonable to direct PG&E, SCE, SDG&E, BVES, Liberty, and PacifiCorp to collect data on the timeline needed to complete projects that exceed 2MW, need substation upgrades, and/or require the customer to take service through an additional Electric Rule.
14. The CPUC may find it reasonable to establish an average service energization timeline applying to projects that exceed 2MW, require substation upgrades, and/or require the customer to take service through an additional Electric Rule.
15. The California legislature has passed two bills, Assembly Bill 1236 (Chiu, 2015) and Assembly Bill 970 (McCarty, 2021) that seek to accelerate the EVSE permitting process.
16. Assembly Bill 970 establishes a fixed schedule of five business days for deemed complete and twenty business days for deemed approved, for an AHJ to approve a permit for the installation of EV charging infrastructure.
17. It is reasonable to include the maximum 25-50 business days to receive an approved permit from an AHJ within the adopted average service energization timeline.
18. Improving customer awareness and education on the service energization process can help accelerate the service energization timeline.
19. It is reasonable to direct PG&E, SCE, SDG&E, BVES, Liberty, and PacifiCorp to develop materials that clearly illustrate the service energization steps that are in the direct responsibility of the utility, the customer, the EVSP, the AHJ, and any other party involved in the service energization process and make it available on their website.
20. Phase 1 of R.21-06-017 directs PG&E, SCE, SDG&E, BVES, Liberty, and PacifiCorp to update their Load Interconnection Capacity Analyses maps.
21. It is reasonable to direct PG&E, SCE, SDG&E, BVES, Liberty, and PacifiCorp, within a Tier 2 Advice Letter, to provide an update on whether they can implement some or all of the planned R.21-06-017 Load Interconnection Capacity Analyses ahead of the

PG&E AL 6607-E, SCE AL 4803-E, SDG&E AL 4011-E, BVES AL 444-E,  
Liberty AL 192-E, PacifiCorp AL 685-E /MTX

schedule adopted in R.21-06-017 for individual circuits or line sections on an as needed basis at the request of a customer

22. It is reasonable to direct PG&E, SCE, SDG&E, BVES, Liberty, and PacifiCorp to provide customers with information available in their Load Interconnection Capacity Analyses map, Generation Interconnection Capacity Analyses map, and Grid Needs Assessment Data Portals, upon request.
23. We do not find it reasonable to adopt a standardized easement process at this time.
24. There are steps in the service energization process that are under the utility's direct control that may be delayed due to factors outside of their control.
25. It is appropriate to require PG&E, SCE, SDG&E, BVES, Liberty, and PacifiCorp to record within their EV Infrastructure Rule data reporting all delays in the service energization process that are under the utility control that are impacted by factors outside of their control.
26. PG&E, SCE, SDG&E, BVES, Liberty, and PacifiCorp must not compromise safety and compliance with regulatory requirements in their efforts to accelerate the service energization process.
27. It is reasonable to direct PG&E, SCE, SDG&E, BVES, Liberty, and PacifiCorp to record all incremental costs required to support the acceleration of the service energization timeline within the EV Infrastructure Rule Memorandum Accounts.

**THEREFORE IT IS ORDERED THAT:**

1. Pacific Gas and Electric Company's Advice Letter 6607-E, Southern California Edison Company's Advice Letter 4803-E, San Diego Gas & Electric's Advice Letter 4011-E, Bear Valley Electric Service's Advice Letter 444-E, Liberty Utilities' Advice Letter 192-E, and PacifiCorp d/b/a PacificPower's Advice Letter 685-E, are approved with modifications. Pacific Gas and Electric Company, San Diego Gas & Electric Company, Southern California Edison Company, Bear Valley Electric Service, Liberty Utilities, and PacifiCorp d/b/a PacificPower are directed to achieve an interim average service energization timeline target of 125-business days.
2. Pacific Gas and Electric Company, San Diego Gas & Electric Company, Southern California Edison Company, Bear Valley Electric Service, Liberty Utilities, and PacifiCorp d/b/a PacificPower (Joint IOUs) shall include all work illustrated in Table 1 that is identified as "Included in Target" within the 125-business day average service energization timeline target.

PG&E AL 6607-E, SCE AL 4803-E, SDG&E AL 4011-E, BVES AL 444-E,  
Liberty AL 192-E, PacifiCorp AL 685-E /MTX

- a. The Joint IOUs shall include within the 125-business day average service energization timeline the 25-50 business days or less needed for a customer to receive an approved permit for electric vehicle supply equipment installations. For projects that do not receive a permit within the 25-50 business days, all additional days that exceed the 25-50 business days permit approval requirement shall not count towards the Joint IOUs' efforts to meet the 125-business day average service energization target.
3. Pacific Gas and Electric Company, San Diego Gas & Electric Company, Southern California Edison Company, Bear Valley Electric Service, Liberty Utilities, and PacifiCorp d/b/a PacificPower shall exclude from counting against the 125-business day average service energization target any project that meets the following conditions: 1) planned additional capacity exceeds two megawatts, 2) a project that triggers an Electric Rule 15: Distribution Line Extension upgrade or any other Electric Rule, and 3) projects requiring a substation upgrade.
4. Within their EV Infrastructure Rule data reporting, Pacific Gas and Electric Company, San Diego Gas & Electric Company, Southern California Edison Company, Bear Valley Electric Service, Liberty Utilities, and PacifiCorp d/b/a PacificPower (Joint IOUs) shall collect and report data for all projects that receive service through the EV Infrastructure Rules to present the number of days each step in the energization process, including steps that are in and outside the utilities' direct control, takes to complete. For each project exceeding the 125-business day average service energization target, the Joint IOUs shall record the following information in their EV Infrastructure Rule data collection efforts: 1) the reason for delay(s), 2) the number of days each step was delayed, 3) the actions the utility took to resolve the delay, if any, and 4) if the step is in the utility's direct control, utility's indirect control, or customer's direct control.
5. Pacific Gas and Electric Company, San Diego Gas & Electric Company, Southern California Edison Company, Bear Valley Electric Service, Liberty Utilities, and PacifiCorp d/b/a PacificPower (Joint IOUs) shall file a joint Tier 2 Advice Letter within twelve months of approval of this Resolution to propose an updated average service energization timeline target that is informed by the Joint IOUs' implementation of the EV Infrastructure Rules.
6. Prior to submitting their joint Tier 2 Advice Letter, Pacific Gas and Electric Company, San Diego Gas & Electric Company, Southern California Edison Company, Bear Valley Electric Service, Liberty Utilities, and PacifiCorp d/b/a



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Liberty AL 192-E, PacifiCorp AL 685-E /MTX

PacificPower (Joint IOUs) shall host a public workshop to discuss the following:

- 1) present data on the Joint IOUs' progress towards meeting the 125-business day service energization timeline; 2) discuss the outstanding barriers toward accelerating the service energization timeline, including any issues with easements, staffing, capacity map improvements, inspection consistency; 3) discuss the Joint IOUs' progress toward overcoming the barriers to accelerate the service energization timeline; 4) present the Joint IOUs' recommendations for updating the service energization timeline, including the proposed number of days, and the energization process steps that are included in the timeline.
7. Pacific Gas and Electric Company, San Diego Gas & Electric Company, Southern California Edison Company, Bear Valley Electric Service, Liberty Utilities, and PacifiCorp d/b/a PacificPower (Joint IOUs) shall develop standardized data categories for projects that 1) have an installed capacity greater than 2 megawatts, 2) trigger an Electric Rule 15 upgrade, 3) are required to go through additional Electric Rules, and 4) require a substation upgrade. Within their EV Infrastructure Rule data collection and reporting efforts, the Joint IOUs shall record data for all projects that fall into at least one of these categories to inform a potential future CPUC adopted average service energization timeline that applies to these projects.
8. Pacific Gas and Electric Company, San Diego Gas & Electric Company, Southern California Edison Company, Bear Valley Electric Service, Liberty Utilities, and PacifiCorp d/b/a PacificPower (Joint IOUs) shall each develop materials that clearly illustrate the service energization process, which shall include 1) steps in the energization process that are the responsibility of the utility, 2) steps in the energization process that are the responsibility of the customer, electric vehicle service provider, and/or authority having jurisdiction. The Joint IOUs shall ensure each step has clear explanations for 1) why the step is necessary, 2) the process to complete the step, and 3) an estimate time frame to complete each step. The Joint IOUs shall make this information available on their EV Infrastructure Rule website for all customers to access.
9. Within the Tier 2 Advice Letter directed in this Resolution, Pacific Gas and Electric Company, San Diego Gas & Electric Company, Southern California Edison Company, Bear Valley Electric Service, Liberty Utilities, and PacifiCorp d/b/a PacificPower (Joint IOUs) shall provide an update on whether they can implement some or all of the planned R.21-06-017 Load Interconnection Capacity Analyses

PG&E AL 6607-E, SCE AL 4803-E, SDG&E AL 4011-E, BVES AL 444-E,  
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ahead of the schedule adopted in R.21-06-017 for individual circuits or line sections on an as needed basis at the request of a customer.

10. Pacific Gas and Electric Company, San Diego Gas & Electric Company, Southern California Edison Company, Bear Valley Electric Service, Liberty Utilities, and PacifiCorp d/b/a PacificPower shall each conduct a quarterly meeting with major electric vehicle service provider customers within their service territory to improve communication and inform customers about new service energization process and assist the customer in the application process.

This Resolution is effective today.

I certify that the foregoing Resolution was duly introduced, passed, and adopted at a conference of the Public Utilities Commission of the State of California held on December 15, 2022, the following Commissioners voting favorably thereon:

/s/ RACHEL PETERSON

Rachel Peterson  
Executive Director

ALICE REYNOLDS  
President

CLIFFORD RECHTSCHAFFEN  
GENEVIEVE SHIROMA  
DARCIE HOUCK  
JOHN REYNOLDS  
Commissioners