BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking to Establish Energization Timelines.	Rulemaking 24-01-018 (Filed January 25, 2024)

OPENING COMMENTS OF THE ALLIANCE FOR AUTOMOTIVE INNOVATION ON SCOPING MEMO

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The Alliance for Automotive Innovation ("Auto Innovators") respectfully submits the following Opening Comments on the Scoping Memo issued on March 28, 2024 in R.24-01-018.

Auto Innovators is a 501(c)(6) non-profit trade association. From the manufacturers producing most vehicles sold in the U.S. to autonomous vehicle innovators to equipment suppliers, battery producers and semiconductor makers – the Alliance for Automotive Innovation represents the full auto industry, a sector supporting 10 million American jobs and five percent of the economy. Active in Washington, D.C. and all 50 states, the association is committed to a cleaner, safer and smarter personal transportation future. (see www.autosinnovate.org).

Timely energization of charging infrastructure is a vital concern to Auto Innovators' members. They are investing billions in developing electric vehicles (EVs) and in the coming years will introduce electrified models in most light duty market segments. To comply with California's Advanced Clean Cars II regulation (ACC II), our members must sell or lease millions of EVs by 2030, and beyond. ACC II sets firm targets and deadlines, and it offers much less compliance

flexibility for OEMs than earlier versions of the ZEV regulation. Beginning in 2026, OEMs will be subject to penalties of up to $20,000 per vehicle if they do not meet their obligations. Because ACC II offers considerably less flexibility than the original ACC program, CARB's projections of annual BEV sales projections more closely approximate the actual number of BEVs that will be sold than was the case in the past.[1] *CARB's ZEV adoption projections are not aspirational forecasts: that should be considered firm for the purposes of grid planning.*

Ubiquitous, reliable, and affordable public charging is essential to support the expansion of EV sales in California. Consumers simply will not choose EVs over conventional vehicles if they lack confidence that they can charge when, where and how they need to do so. Several members are also deploying public charging stations in California and beyond.[2] Delays in energization harm the business case for the build-out for these much-needed facilities. For OEMs and third-party EV Service Providers (EVSPs) alike, timely energization is essential to ensure that their investments in EV charging infrastructure, equipment, real estate, structures, and amenities translate into much-needed range confidence for prospective EV drivers.

Some of Auto Innovators' member companies also manufacture medium duty vehicles and are subject to the Advanced Clean Trucks (ACT) rule. In turn, some of their customers are subject to CARB's Advanced Clean Fleet (ACF) regulation. Fleet operators must be able to upgrade the electricity service to their depots in a timely manner to integrate EVs into their operations. Unfortunately, delays in securing access to the grid have proven to be a persistent barrier. Many operators are adding EVs to their fleets for the first time. If the process to access the

[1] A. Bui, D. Hall and S. Searle, "Advanced Clean Cars II: The Next Phase of California's Zero Emission Vehicle and Low Emission Vehicle regulations," ICCT Policy Update, Nov. 2022, pp. 2-3. Retrieved from: https://theicct.org/wp-content/uploads/2022/11/accii-zev-lez-reg-update-nov22.pdf.
[2] Capparella, Joey, "Seven Automakers Will Open a Vast EV Charging Network Together in 2024, Car and Driver, July 26, 2023. Available at https://www.caranddriver.com/news/a44649909/automakers-ev-charging-network-joint-venture/

grid does not go well, or get done in time, the results may be postponed or cancelled EV projects and plans. For MDEV adoption to cross over into the early majority-stage it is imperative that the first movers have positive experiences.

I. Answers to questions posed in the Scoping Memo: Phase 1

1. ***What average and maximum energization time periods should the Commission establish as target timelines on or before September 30, 2024, in order to comply with Pub. Util. Code Section 934(a)(1) for electric utility customers?***

   A: Ultimately energization timelines should converge with customers' time frames to sell EVs, electrify fleets and deploy public charging infrastructure. The utilities and CPUC should internalize CARB's deadlines (and the timelines for supporting third party investment) in their own timelines for grid upgrades.

   For fleet depots energization timelines should align as closely as possible with fleet operators' compliance obligations under ACF and their planning and vehicle ordering cycles for incorporating EVs into their fleets. Unexpected delays in energizing depots can lead to project delays or cancellation of orders for EVs. The light- and medium-duty fleet sector is highly diverse and fleet sizes range from a handful to hundreds of vehicles, so the pace of fleet electrification will vary: one fleet may gradually replace conventional vehicles with EVs while another may go electric all at once. The adoption cycle can be as short as three months.

   The timelines for energizing public charging stations should align as closely as possible with EVSPs' timelines to complete construction and begin offering service to drivers. Limited availability of public charging is a barrier to mass adoption of EVs and is especially detrimental to adoption by potential drivers who are unable to charge at home.

   Auto Innovators appreciates that the utilities face numerous challenges today, and that they may have difficulty meeting aggressive timelines initially. Accordingly, CPUC oversight should focus first on driving steady improvement, not penalizing systematic delays. As a result of implementing the Phase 1 and 2 measures, the utilities' average time-to-completion should improve over time. Therefore, the timelines should become more aggressive over time, eventually converging with

mandated timelines for fleets to electrify, OEMs to meet their ACC II and ACT obligations, and for EVSPs and OEMs to develop enough public charging infrastructure to serve the growing EV population driven by CARB's regulations.

The initial timelines should also be informed by the data provided by the utilities in response to the data request, but they should be set to require improvement right from the start.

a. What are the typical steps in the energization process, or energization of electric service under Rules 15, 16, 29, and 45?

A: See the utilities' response to CPUC's data request.

b. How long does it take for a utility to complete each step in an energization request?

A: Currently, the seldom-realized best-case timeline to energization for a generic public DCFC site in California is two years. The factors that most commonly extend the energization timeline beyond this benchmark are:

- Whether there is sufficient electrical circuit capacity to serve the load at the site location and how long it takes to upgrade the circuit capacity if required. (It is not uncommon to see a 3-4 year lead time to energize projects when circuit capacity upgrades are required.)
- How long it takes for the local AHJ to permit the project. Permitting has improved in recent years with the passage of AB 1236 and AB 970.

Assuming there is circuit capacity to serve the project and the local permit/zoning process is not unduly long, the factors causing this ~2-year window to be as long as it is (and sometimes longer) include:

- Waiting for utilities to conduct and provide results for feasibility studies once the customer submits the application request and pays the initial feasibility fee.
- Waiting for utilities to complete make-ready infrastructure work including conduit installation (if Rule 29) and interconnection facilities work (e.g., transformer pad and installation).

It typically takes longer for the utility to undertake make-ready work compared to the customer. For this reason, projects under Rule 15/16 are faster than projects under Rule 29 (where utility runs conduit, etc.). Customers face a trade-off between lower cost (Rule 29) and faster energization (Rules 15/16).

Additionally, the process can be lengthier and more difficult when utilities contract with "third party vendors" to coordinate with customers on site energization requests.

i. Does it differ for new service line requests and upgrades to existing service lines, or across different customer types?
A: No response.

ii. If so, how?
A: See the utilities' response to CPUC's data request.

c. Which steps in the utilities' energization process should have assigned target timelines?

A: A timeline for the entire process-- from start to finish-- should be established for each project type. Having an end-to-end timeline will give utilities flexibility and incentives to work with customers to implement process improvements, adopt best practices, and develop and deploy creative solutions that can speed energization. Examples of such measures are providing more accurate and actionable, granular, and up-to-date available capacity data through improved hosting capacity maps (ICAs), proactive outreach to EVSPs and fleet operators (particularly small and medium-sized fleets), integration of DERs that can mitigate or defer infrastructure on the customer or utility side into the plan for a site, and dedicated, end-to-end technical support for customers deploying charging infrastructure or adopting EVs.

It will also be helpful to track each phase of the new service request process using the same metrics applied to the end-to-end timeline. Identifying where bottlenecks are occurring is the first step toward addressing the factors causing them. There should be a cyclical feedback process for continuous improvement from the provision of data, annual reporting, with support and feedback from a quarterly convened working group focused on EV infrastructure (described in our response to 3.a.) and informing the 2-year evaluation and target-setting.

d. How should the Commission determine whether an energization timeline is reasonable?

A: A timeline is reasonable if it allows most projects to be energized in a timeframe consistent with the customer's intended operations, especially if the

customer is an "obligated entity" seeking to fulfill CARB's or other regulatory requirements.

Having EV charging infrastructure deployed is critical for fleets adopting EV, with heightened need for fleets covered under the ACF rule. Aligning infrastructure deployment as much as possible with vehicle order timelines is crucial to ensure that grid infrastructure is not a bottleneck that dampens the market despite customer interest and plans. Timely energization is critical for operational readiness, reducing costs, minimizing downtime, and avoiding stranded assets in fleets (eg. EVs). It is important to highlight that many fleets will be electrifying for the first time – and the initial experience will shape their future plans. Aligning EV charging infrastructure deployment and energization with vehicle order timelines – which can be as short as three months – will ensure a better customer experience, a smoother more cost-effective transition, and best position fleets in the state to meet their compliance obligations under the ACT and ACF regulations.

e. ***How should targets be structured to minimize delays when addressing existing and future customer energization requests?***

A: Classification of project types for this purpose should consider availability of measures that can hasten energization or enable an interim solution acceptable to the customer (e.g. phased energization, managed charging, storage and/or solar solutions, etc.). Auto Innovators understands that this is the gist of the "Decision Tree" approach advanced by NRDC and EDF in their Opening Comments on the OIR,[3] and agrees with their perspective. Utilities should have an obligation to evaluate both utility- and customer- owned/operated solutions. It is important for the Commission to adopt "guardrails" that ensure that the utilities take a pro-active approach to working with customers and discourage utilities from dismissing projects outright. Utilities should conduct a rigorous and transparent process for evaluating projects and recommending options and alternatives as a solution.

f. ***What information should be tracked to assess improvement in utility timelines for energization after the targets set on or before September 30, 2024, are established?***

[3] *Opening Comments of EDF and NRDC on Order Instituting Rulemaking to Establish Timelines for Energization*, pp. 3-4.

A: The aim of this process should be to track actionable data that can be used to assess progress and drive a cycle of continuous improvement. The utilities should be required to report both quantitative metrics and qualitative assessments. Even if there are not separate timelines for different end-uses, the utilities should track and report timeliness metrics for EV project categories, by end-use and project type, (e.g. residential vs. commercial EVSE projects and Fleet depot projects). It is important to track progress at this level of granularity to ensure that energization delays cease to be a bottleneck that impedes attainment of California's transportation electrification requirements.

Quantitative metrics should include: Average and maximum time to completion, time to complete each stage of the process, customer class and potential additional customer categorization and segmentation (EV (commercial vs. residential, fleet depot, etc.), building, agriculture, etc.), capacity requested and delivered, whether the project required service upgrades on the customer side or utility upstream upgrades and upgrade type (primary, secondary voltage), and whether the project is located in an environmental or social justice community. Auto Innovators recommends requiring the utilities to produce data on the full universe of projects (as required under the recent data request) to enable stakeholders to "drill down" on disparities across project types. The data should be anonymized to protect customers' privacy and sensitive commercial information, as needed.

The utilities should also be required to report information on mitigating solutions considered and/or deployed.

- For sites that **do not** meet their timeline, the Commission should require a description of the challenges encountered, (ii) enumeration of mitigating measures that were considered and **not** adopted, (iii) a brief explanation of why they were deemed infeasible, and (iv) potential solutions that could be developed in the future for that type of project.

- For sites that **do** meet their timeline, the Commission should require a description of the challenges encountered, (ii) enumeration of mitigating measures that were considered and adopted, (iii) a brief explanation of why they were deemed suitable, and (iv) how they could be implemented more widely.

2. ***Should the utilities be directed to establish reporting processes for Commission review of their compliance with the targets set no later than September 30, 2024, pursuant to Pub. Util. Code §934(a)(2)?***
   A: Yes. Data on the number and status of customers' reports of energization delays should be published in a dashboard on the Commission's website. The utilities should be required to include summary data on customer reports to the commission in their annual reports along with the information and an analyses identified in our answer to Question 1.f. Current data and findings should also be available *at least* quarterly to inform an industry working group convened to provide recommendations to the PUC and utilities (see our answer to question 3.a.).

3. ***What procedure(s) for customers should exist to report energization delays for new and upgraded electric service? What additional procedure(s) or improvements should be made for customers on or before September 30, 2024?***

   A: Reporting should be focused on identifying problems so the Commission and utilities can establish processes to resolve them. Based on analysis and evaluation of utility data and reporting, solutions should be developed and implemented to drive continuous improvement. Below are recommendations to improve the customer-utility engagement process, along with recommendations to address challenges systematically through an industry working group convening to analyze and propose solutions.

   In instances of persistent, lingering, or unattended issues for individual customers or representative customer types, there could be a designated CPUC Ombudsman to help ensure timely resolution. It would be best for accelerated EV adoption in the market to get ahead of these issues and ensure that this remains a last resort when all best efforts have not yielded transparent and timely resolution.

   a. ***How do utilities currently engage with customers that may have pending or missed deadlines in their energization project requests? How should utilities improve engagement with customers?***

   A: While individual sites and projects are unique, customers regularly face several specific challenges when engaging with utilities to energize EV projects. These challenges include lengthy and uncertain timelines, lack of necessary upfront information, mixed experience in receiving adequate communications about project status, differing and difficult to navigate processes within or across utilities, and

mixed and varying levels of attention and engagement determined by whether or not a customer has a dedicated account representative, or whether or not a customer has been accepted into a utility charging infrastructure program.

Operators of large fleets (e.g. retail chain operators) are often already classified as key accounts due to the scale of their existing commercial activities; they are more likely to receive focused attention from a dedicated account representative. Operators of smaller and medium sized fleets may not qualify as key accounts before they begin to adopt EVs, but their load could grow rapidly to that scale as they electrify. These customers need a proactive "on-ramp" to key account status and dedicated support. Currently, customers may receive this dedicated support if they are accepted into a customer program for make-ready infrastructure incentive funding and support, however, most customers will not be included in these programs.

These small and medium fleet customers require special attention and engagement by utilities to help them navigate the complex infrastructure planning process, and inform utilities on where load impacts are expected. The following recommendations can help address these challenges for fleets and EVSPs:

- Dedicated team, tools, and processes geared towards fleet electrification and deployment of DCFC, with expertise housed within planning and customer-facing teams. These resources must be scaled beyond existing make-ready customer programs and staffing.
- Assigning resources to projects and being responsive once the feasibility study is completed and the site moves into the design phase and beyond.
- More utility resources to specifically provide attention to small and medium commercial customers that may not historically have had key account or individual customer service attention but have significant electrification needs – particularly in fleet electrification.

Beyond the individual customer-utility experience and engagement, there is also a general concern that these challenges and issues will only grow as EV projects scale toward mass adoption. Having inadequate staff and resources to process energization requests is one obvious factor driving even "best case" utility energization timelines in California to be longer than they are in other regions of the U.S.

To address issues holistically and systematically, the following recommendations are also provided:

- Utilities providing a common customer-facing dashboard for project status,
- Utility sharing more information upfront, including more up to date and actionable hosting capacity data to help customers make timely and informed decisions,
- Commission convening of a quarterly industry working group with representatives from the utilities, OEMs, EVSPs, fleet operators, and other industry stakeholders to specifically review utility reporting and data and identify bottlenecks and pain points, share information and best practices, and develop solutions to improves energization processes.

b. How should the Commission improve the existing processes for how customers report ongoing energization delays to the Commission?

A: Auto Innovators is not aware of any existing process to report delays to the Commission.

In addition to achieving timely energization for EV projects, it is important for the process to be transparent, responsive, and customer-centered. The process of driving continuous improvement through reporting and implementation of actionable recommendations should create the conditions to limit the cases of ongoing energization delays. The actions described in our response to question 3.a. should mitigate these instances over time.

There may be instances where despite best efforts, ongoing delays need addressing in particular cases. A designated CPUC team or ombudsman could be dedicated to investigating and resolving ongoing or lingering issues on behalf of individual or representative customers for particular project types (for example: commercial or public fleet electrification). The ombudsman would serve as a single point of contact through the resolution process.

4. ***Are there end-use project types that justify unique energization timelines pursuant to Pub. Util. Code § 933.5(a)(1)(B)? If so, what types of end-use projects, and for which electric tariffs?***

A: There should be relatively few categories of project types for the purpose of setting timelines and monitoring utility performance relative to those benchmarks. Auto

Innovators understands that the timeline for the category encompassing the most complex projects will be longer than for most projects. These include projects with substantial upstream capacity upgrades and unanticipated engineering or construction work, per § 933.5(a)(1)(B). Auto Innovators also appreciates that some new service requests involve unanticipated new load, however the CPUC and utilities should work to reduce such surprises over time through improved outreach to fleet operators and EVSPs and via updated planning processes. We appreciate that the Commission is considering such initiatives in R.23-12-008 and R.21-06-017.

ZEV policies in CA, particularly ACF set ambitious targets for fleet electrification, with ZEVs required to account for an increasing percentage of sales over time. To comply, fleets need deployment of charging options that match the pace of expected vehicle turnover and adoption. Delays in energization can hinder fleet operators' ability to meet the necessary targets to transition fleets. Utilities should track and evaluate these projects for solutions to help accelerate energization timelines and ensure projects receive appropriate attention to meet ACF timelines. Similarly, EVSPs and OEMs must be able to count on energization timelines that enable them to deploy charging infrastructure at the pace needed to support levels of LDEV adoption commensurate with CARB's sales mandates for OEMs.

A growing number of projects today are likely to involve bidirectional power flows enabled by Vehicle-to-Grid (V2G) technology. In addition to the energization rules, these projects are also subject to Rule 21. Ideally, the inclusion of V2G at a site should not extend the timeline for energizing it. To ensure coordination across these two pathways to the grid, energization projects that also involve Rule 21 should be tracked in a separate category.

5. ***What are the existing utility timelines for upstream capacity upgrades that are triggered by energization projects including, but not limited to, new substation construction?***

A: Some fleet operators have been informed that upstream grid upgrades may add *several years* to energization, greatly delaying or scuttling their plans for vehicle electrification projects. One DCFC developer reported that it is not uncommon to see a three- to four-year lead time to energize projects when circuit capacity upgrades are required. The utilities' response to the Data Request should provide quantitative data to assess the frequency with which this occurs.

Additionally, in the process for ongoing reporting, utilities should track and provide information on whether a project is driven by a customer's need to comply with fleet rules, support compliance with ACT or ACC II, or implement other policies. Utilities should also report on what other options could exist to mitigate or defer the capacity upgrade with solutions on either the utility or customer side, including phased energization, DERs, and managed charging. If it is determined that upgrades would be needed regardless of mitigation, there should be an internal utility process to collect and analyze impacts and locations in proactive utility planning and investment processes to ensure necessary upgrades keep a pace ahead of expected electrification plans in market.

a. Should upstream capacity upgrades triggered by energization requests justify a unique energization target pursuant to Pub. Util. Code §933.5(a)?

A: Yes, in some cases. See response below regarding fleets facing compliance with policy requirements related to vehicle electrification). Most energization requests, including those involving upstream capacity upgrades, should have energization targets. Auto Innovators recognizes that in the near term the targets may be aspirational for certain upstream capacity upgrades. In those instances, the timelines are still valuable to convey the Commission's expectations and as benchmarks against which the Commission can measure progress as it and the utilities adopt new planning methods, process improvements and other initiatives to speed up all kinds of energization requests. Shining a spotlight on gaps and progress made by utilities efforts to accelerate energization timelines will provide an incentive to adopt such measures.

b. If so, why, and which steps of upstream capacity upgrade projects are unique? What type of upstream infrastructure projects should receive unique timelines?

A: Upstream infrastructure projects that are on the critical path to energize charging infrastructure or fleet depots should receive special consideration. Acceleration of charging and supportive infrastructure deployment is critical to support EV adoption, and timely energization is necessary to achieve the state's electrification targets as defined by the ACC II, ACT and ACF rules.

6. What specific criteria should the Commission establish as annual reporting requirements for the electrical corporations pursuant to Pub. Util. Code Section 933.5(a)(2)?

A: The information required to be reported by Pub. Util. Code Section 933.5(a)(2) is likely to be too little too late.

More impactful will be the tracking and reporting requirements proposed in our response to question 1.f. This near "real time" information will provide insights to enable speedy adoption of process improvements, innovative solutions and other best practices that will drive the much-needed cycle of continuous improvement and standardization across the utilities. These quantitative and qualitative data should be summarized in the Annual Report in addition to the information specified by Pub. Util. Code Section 933.5(a)(2). The Reports should also describe the steps that the utilities and the Commission took to act upon the data and any available observations about their effectiveness.

7. What potential impacts on environmental and social justice communities should be considered or prioritized in the development of energization timelines and reporting processes to ensure the processes adopted in this Rulemaking are in alignment with the Commission's Environmental and Social Justice Action Plan?
A: Consistent with Goal 2 of the Plan, "Increase Investment in Clean Energy Resources to Benefit ESJ Communities, Especially to Improve Local Air Quality and Public Health," [4] the Commission should ensure that the utilities energize facilities to enable transportation electrification in those areas at a rate that matches or exceeds their performance elsewhere.

8. How often should the Commission update the average and maximum energization targets, and what factors should trigger updates to the targets?
A: Updates should occur at least every two years. The Commission should re-evaluate the timelines annually following submission of the utilities' reports and consideration of recommendations from a industry stakeholder working group that meets at least quarterly to provide feedback and actionable recommendations based upon utility data and customer reports. It should also consider the rapidly changing landscape of vehicle and charging technologies as these innovations may yield new solutions to speed energization.

9. Should the energization targets be phased [in] over time?
A: The energization targets should be effective immediately. As noted above, even if they are currently mostly aspirational for certain project types, they serve as a benchmark.

IV. Answers to questions posed in the Scoping Memo: Phase 2

[4] *Environmental and Social Justice Action Plan Version 2.0*, April 7, 2022, pp. 23-24.

1. How could data collected about the utilities' timelines for energization of electric service and the associated customer reporting processes be utilized to improve existing timelines?

A: See answer to question 1.f. in preceding section. Auto Innovators believes that the Commission does not need to defer addressing this question until Phase 2. *The purpose of the reporting requirements to be adopted along with the timelines in Phase 1 should be to inform a cycle of continuous improvement. This process should launch without delay.*

2. How could energization timelines better align across utilities, end-use project-types, and/or technology type?

A: Realized timelines should begin to align across utilities and project types with greater transparency and as a common set of process improvements and best practices are incorporated into processes to handle new service requests across the three IOUs. Without alignment, customers whose services or operations span multiple service territories will have to grapple with increasing complexity and cost in bringing electrification plans to fruition in market. Alignment and standardization can reduce costs, accelerate customer electrification plans, enable scalability, and improve the overall customer experience in charging and supportive infrastructure deployment.

3. Should additional actions beyond compliance with SB 410 and AB 50 be implemented to improve energization timelines, processes, or tariffs in Phase 2 of this proceeding?

A: No response.

4. What actions can expedite energization projects, including when upstream upgrades are necessary?

A: No response.

5. Considering the outcome of Phase 1, above, are additional actions necessary for implementation of Pub. Util. Code Sections 933.5(a)(3), 933.5(b), 933.5(d), 934, and 945?

A: No response.

6. When a utility requests a new ratemaking mechanism pursuant to Pub. Util. Code Section 937(b), how should the utility report that within the reporting requirements established by Pub. Util. Code §§ 933.5(a)(2) and 933.5(b) in Phase 1?

A: No response

a. How should the incremental ratepayer funding authorized through any Commission-approved ratemaking mechanism pursuant to Pub. Util. Code §933.5 be tracked to ensure it is going toward energizing customer projects?
A: No response

b. How can that information be accurately reported?
A: No response

c. Should this information be tracked in the utilities' General Rate Cases, in Phase 2 of this Rulemaking, in a separate proceeding, or through an Energy Division advice letter process?
A: No response

7. What potential impacts on environmental and social justice communities should be considered or prioritized in the improvement of energization timelines and reporting processes to align with the Commission's Environmental and Social Justice Action Plan.
A: See answer to Phase 1 Question 7.

V. Conclusion

Auto Innovators appreciates the opportunity to comment on the Scoping Memo. We thank the Commission for moving swiftly to meet the statutory deadline for adopting timelines and reporting requirements. We also strongly encourage the CPUC to order in the Phase I decision additional measures, such as the industry working group and more frequent and detailed tracking, to speedily initiate a collaborative effort to maintain a cycle of continuous improvement.

Respectfully submitted,

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