

DOCKETED	
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Electrify America

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Electrify America operates the largest open ultra-fast only* network in North America

NUMBER OF STATIONS: 1000+

NUMBER OF CHARGERS: 4700+



*Electrify America's network does not include DC fast chargers below 150kW

The largest roll-out of onsite behind-the-meter battery energy storage coupled with ultra-fast DC chargers in North America



Conceptual Design of DCFC site with Battery Energy Storage



Electrify America faces 3 key opportunities with the deployment of battery storage and interconnection activities

1

Rule 15 (Line Extension)

- Line extension assessment ignores impact of Rule 21 Energy Storage / Solar
- Projects may be stalled during Rule 15 activities due to non-EV load requests despite Rule 29/45 prioritization for EV load

2

Rule 29/45 (New Service)

- Reduces investment risk and accelerates investments for DCFC operators
- Minor ancillary load (auxiliary lighting, security cameras, etc.) can be interpreted subjectively to disqualify Rule 29/45 eligibility depending on IOU reviewer, delaying project timeline and incurring repeated redesign costs

3

Rule 21 (Energy Storage/Solar)

- Assumes DCFC & Energy Storage/Solar tasks are happening in sequence instead of parallel resulting in duplicative upgrades and cost
- Rule 21 is not interpreted uniformly across IOUs as there are one off requirements that may be applicable within a utility

Opportunities exist for Synergies between Rule 15, Rule 29/45, and Rule 21 to reduce upgrade timelines, cost, and complexity

Example Utility Interactions

ENERGY STORAGE AS ADDED LOAD

- Utilities often consider energy storage as added load and require detailed system studies for pre-existing system conditions that should be out of scope
- Customer certification should be sufficient to avoid load study fees and project delays

INAPPROPRIATE RULE 21 FAST TRACK FAILURES

- 1 IOU required supplemental review based on aggregate generation capacity on the circuit (solar), even though the energy storage was non-exporting for behind-the-meter use only
- Other utilities waive this screen, recognizing it as irrelevant for non-export systems as it may cause project delays and additional fees

RULE 29/45 TOTALIZED METERING

- IOUs in California have a nonstandard approach towards totalized metering needed for multiple co-located services for larger EV installations
- Potential impact of a rejected totalized metering request can be ~\$1M+ over 10 years

GENERATING FACILITY INTERCONNECTION AGREEMENT FOR NON-EXPORT GENERATING FACILITIES

APPENDIX D (If Applicable)

OPERATING REQUIREMENTS FOR ENERGY STORAGE DEVICE(S)

The following Operating Requirement(s) apply to the charging functions of the Generating Facility:

- ☐ Producer's storage device(s) will not consume power from Distribution Provider's Distribution System at any time.
- ☒ Producer's storage device(s) will not cause the Host Load to exceed its normal peak demand. Normal peak demand is defined as the highest amount of power required from the Distribution System by Producer's complete facilities without the influence or use of the energy storage device(s).

<p>Screen M: Is the aggregate Generating Facility capacity on the Line Section less than 15% of Line Section peak load for all line sections bounded by automatic sectionalizing devices?</p>		
No(Fail)		
<p>Maximum Possible Penetration: 15% Calculated Penetration: 41.12%</p>		
<p>Supplemental Review is required.</p>		

Number of Meters: Only one meter will be installed for a single non-residential enterprise on a single Premises, except:

- a) When otherwise required or allowed under utility's tariffs
- b) At the option of and as determined by utility, for its operating convenience, consistent with its engineering design;

Thanks For Your Time