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Electrify America, LLC Comment- 2025 Integrated Energy Policy Report (IEPR) on Interconnection and Energization

Additional submitted attachment is included below.

California Energy Commission (CEC)
715 P Street
Sacramento, CA 95814

Subject: 2025 Integrated Energy Policy Report (IEPR) on Interconnection and Energization

Chairman Hochschild,

Electrify America is happy to submit these public comments on the record after participating in the August 11th CEC IEPR workshop. This memorandum summarizes the remarks from Jigar J. Shah, Director of Energy Services at Electrify America, and makes recommendations for the CEC's and California Public Utilities Commission's (CPUC) consideration. Electrify America operates the largest open Hyper-Fast network in North America with 1000+ charging stations and 4,800+ chargers as of August 2025, and we have widely implemented energy storage technology at many charging site locations in the state of California.

Under **Rule 15**, line extension work is assessed without considering the capacity implications of behind-the-meter energy storage submitted in parallel under Rule 21, which can overstate upgrade needs and extend timelines – and ultimately ratepayer costs. Furthermore, while there are established timelines for Rules 29 and 45 designed to accelerate EV charging infrastructure, Electrify America's experience is that Rule 15 upgrades often result in the *de-prioritization of* EV infrastructure projects in favor of completing non-EV charging infrastructure projects first before the clock starts under Rules 29 and 45. Electrify America recommends reform to Rule 15 on both of these aspects to meet the CEC's objectives as it relates to EV charging infrastructure.

Under **Rule 29 and Rule 45,** utility side service extensions for separately metered EV charging are intended to work together with Rule 15 and Rule 21. Electrify America pointed out inconsistencies with eligibility and metering determinations that create friction and cost uncertainty. Our examples shared during the workshop pointed to some utilities splitting minor ancillary loads into separate services under different new service rules (e.g. Rule 16). For example, a low wattage security device was initially routed as a separate new service request and deemed not eligible to be on the EV charging service, which created added scope and months of delay. In another example, a Rule 29/45 reversal on totalized metering eligibility across multiple secondary services (designed to avoid medium voltage) erased the expected demand charge profile and jeopardized project economics by approximately $1M over ten years, reducing further investment in that utility. Electrify America recommends that a standardized approach be developed across investor-owned utilities (IOUs) both for totalized metering of secondary services as well as ancillary load that is commonly needed

on the same electric service as charging infrastructure – such as security cameras, AHJ-required irrigation, and immediate lighting.

Under **Rule 21**, sites with non-export storage paired with DCFC inappropriately fail the fast track process in one electric utility service territory, primarily due to aggregate generation screens that were designed for exporters. For example, an IOU applied the line section penetration screen with a 15% threshold and forced supplemental review even though the storage was meant for non-export uses behind the meter. While the other two major IOUs also conducted this screen as part of the fast track process, the results were discarded and deemed not relevant to force supplemental review. In addition, there are inconsistencies amongst IOUs where some may treat energy storage as added load requiring a separate Rule 16 application and request studies for preexisting conditions in addition to Rule 21, despite the energy storage controls being certified to *reduce demand* as part of the Rule 21 interconnection paperwork – a practice the other two utilities approach differently. Electrify America is requesting a statewide framework for review of non-export storage as a mitigating element for capacity constraints and to ensure developers do not have to apply under multiple rules for a single system.

Electrify America makes these recommendations with the expectation that the rules referenced will work together. A single energy storage request for a DCFC charging site should travel with the project through Rule 15 studies, Rule 21 interconnection, and Rule 29 or Rule 45 new service work without requiring developers such as Electrify America to coordinate studies between different departments at the same utility and point out redundant upgrades or costs. We recommend an established process on coordination between all three rule teams where timelines, studies, and upgrade costs are cohesively analyzed to reduce overall project costs and meet the state's EV charging infrastructure goals.

Additionally, to the extent a project has already begun the applicable Rule 15, Rule 21, or Rule 29/45 process, it is imperative that the CPUC require the applicable IOU to provide regular, transparent information about remaining funding available for such processes. On August 22, 2025, one of the IOUs filed Advice Letter 4705-E indicating that it is closing its Rule 45 tariff and terminating contracts that have not received a Notice to Proceed, with no option provided to transition such projects to a different rule to keep them on-track. This will further complicate the expected time to energize charging stations in California, adding costs for EV customers, more so if a given project must restart the approval and energization process. DCFC charging sites require significant operational and financial planning well before they are installed, and any changes impacting the costs and timelines associated with ongoing development should be grandfathered-in under Rule 29/45 until a clear future cutoff date to avoid IOUs from retroactively cancelling projects already in progress.

Electrify America remains committed to enabling more charging infrastructure in the State of California. Clarifying how Rule 15, Rule 21, Rule 29/Rule 45 interact, using the specific examples above, will shorten energization timelines and lower total cost - especially as capacity constraints become more commonplace in the years ahead.

Sincerely,

Jigar Shah
Director of Energy Services
Electrify America, LLC
Jigar.shah@electrifyamerica.com

Attachment 1 – Electrify America's August 11th Panel Discussion Materials

Electrify America

Jigar J. Shah

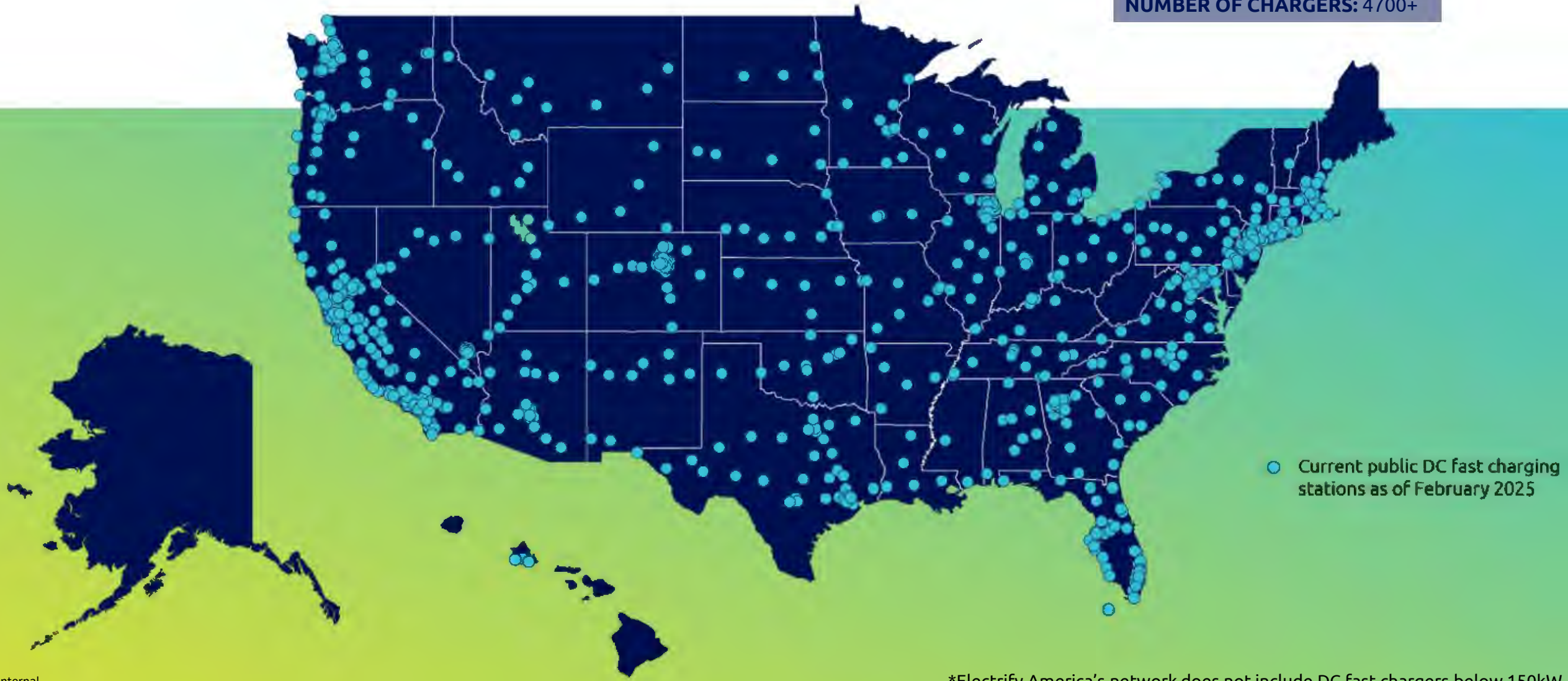
Director of Energy Services

Jigar.Shah@electrifyamerica.com

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)

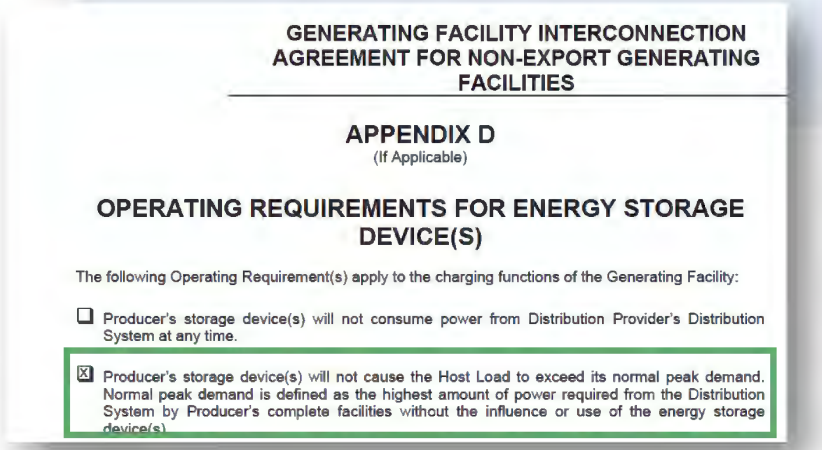
- Assumes DCFC & Energy Storage/Solar tasks are happening in sequence instead of parallel resulting in duplicative upgrades and cost
- Rule 21 is not interpreted uniformly across IOUs as there are one off requirements that may be applicable within a utility

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



GENERATING FACILITY INTERCONNECTION AGREEMENT FOR NON-EXPORT GENERATING FACILITIES

APPENDIX D
(If Applicable)

OPERATING REQUIREMENTS FOR ENERGY STORAGE DEVICE(S)

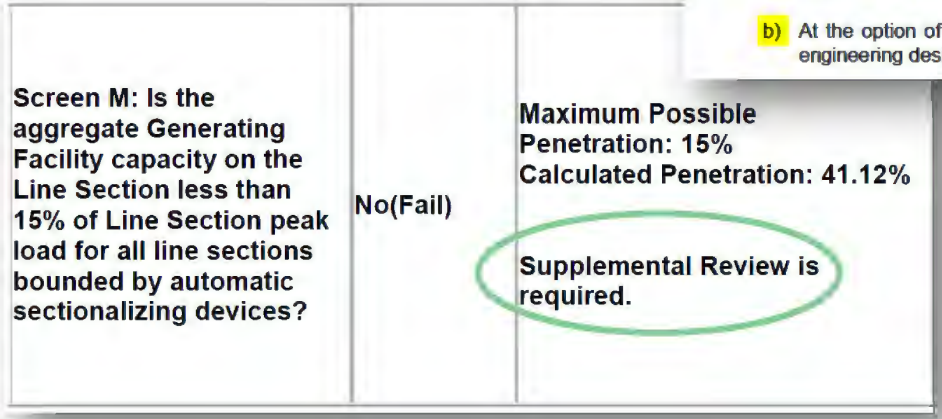
The following Operating Requirement(s) apply to the charging functions of the Generating Facility:

☐ 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).

INAPPROPRIATE RULE 21 FAST TRACK FAILURES

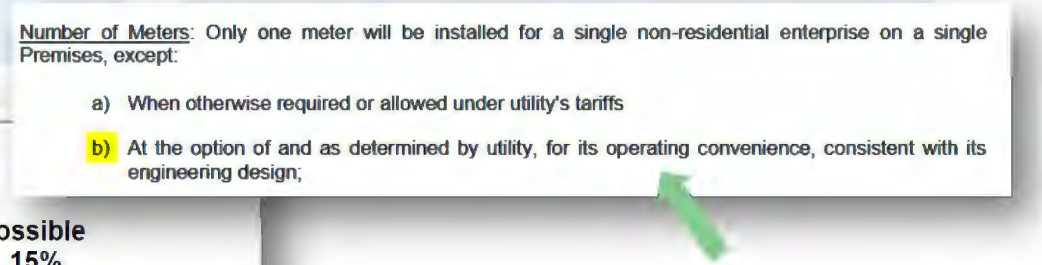
- 1 IOU required supplemental review based on aggregate generation capacity on the circuit (solar), even though the energy storage was non-exporting for behind-the-meter use only
- Other utilities waive this screen, recognizing it as irrelevant for non-export systems as it may cause project delays and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



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?	**No(Fail)**	**Maximum Possible Penetration: 15%** **Calculated Penetration: 41.12%** **Supplemental Review is required.**

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



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