

DOCKETED

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**Post Workshop Comments AB 2127 EV Charging Infrastructure
Assessment Implementation**

Additional submitted attachment is included below.



March 29, 2019

Noel Crisostomo
California Energy Commission
Dockets Office – MS-4
Re: Docket No: 19-IEPR-04
1516 Ninth Street
Sacramento, CA 95814

RE: Post Workshop Comments on the Electric Vehicle Charging Infrastructure Assessment (AB 2127)

Dear Mr. Crisostomo:

Tesla appreciates the opportunity to provide feedback on the California Energy Commission's (CEC) initial implementation of the electric vehicle (EV) charging infrastructure assessment (Assessment) pursuant to AB 2127 (Ting, Chapter 365, Statutes of 2018). Per the provisions in AB 2127, it is important that the CEC work in partnership with the California Air Resources Board (CARB) and the California Public Utilities Commission (CPUC) to develop the charging infrastructure needs assessment and incorporate on-going efforts to help meet California's long-term transportation electrification and greenhouse gas (GHG) emissions reduction goals.

During the workshop on March 11, 2019, staff asked several questions regarding the prioritization and development of various elements of the Assessment. Tesla addresses key near term questions in response to the workshop questions below and looks forward to providing additional input as needed as the Assessment effort moves forward.

Generally, we agree with the CEC's goal to provide an "independent, objective technology assessment" which is needed in the near term to address questions around the availability and sufficiency of infrastructure and needs for additional infrastructure.¹ This initial Assessment should focus on providing objective data that can inform near term program design at both the state and local level. In the longer term, there are many additional factors to consider as outlined in the considerations for expanded infrastructure projections and as further discussed in our comments below.² Therefore, Tesla supports a phased process as outlined by CEC staff during the workshop as gathering all the necessary data and incorporating all the necessary factors for future projections in all the vehicle sectors will require longer-term, dedicated resources.

Prioritization for 2019 IEPR

During the workshop staff requested input on the prioritization for what could be incorporated into the 2019 Integrated Energy Policy Report (IEPR). Tesla recommends that for the 2019 IEPR focus be on the light duty sector looking at both chargers and make-ready infrastructure where feasible, recognizing that several of the utility programs and efforts gathering data on make-ready infrastructure are still underway. Additionally, there may be some items in the "other" category such as "number of unique EVSE models available for purchase" where data may be more accessible in the near term.³

¹ Implementing AB 2127 CEC Staff Presentation, Slide 12. Available at: https://www.energy.ca.gov/2019_energy_policy/documents/2019-03-11_workshop/2019-03-11_presentations.php

² Implementing AB 2127 CEC Staff Presentation, Slides 8-9.

³ AB 2127 Scoping Matrix, Light Duty. Available at: https://www.energy.ca.gov/2019_energy_policy/documents/2019-03-11_workshop/2019-03-11_documents.php

Heavy-duty infrastructure will require additional, longer term research for developing an Assessment and would be difficult to assess in the timeline of the 2019 IEPR. The heavy-duty Assessment will need to consider the various use cases for heavy-duty vehicles, which will impact charging scenarios and power levels, and current data is still more limited for this sector given some products are just entering the market.

Future Assessment Components

There are many areas to further develop and focus on for future components of the Assessment in 2020 and beyond, several of which were outlined in the CEC staff presentation during the workshop. One important deliverable going forward will include understanding areas of additional grid capacity and potential optimized areas for infrastructure deployment on a county and utility service territory level. Furthermore, it will be important to analyze and account for the interactions between infrastructure factors such as travel demanded, vehicles used, and infrastructure needs as outlined in the workshop presentation.⁴ This will also help determine via optimization tools and other existing data methods how to best meet the GHG emissions targets given various modes of transportation and mobility efforts being undertaking at the local level per SB 375 (Chapter 728, Statutes of 2008).

Tesla appreciates the Energy Commission's efforts to collaborate with stakeholders to determine the near and long-term priorities for implementing the EV charging infrastructure assessment. As the Assessment will need to be updated regularly, there is an opportunity to continue to evolve the data inputs, outputs, and assumptions over time. Tesla looks forward to continuing to work with staff and provide additional input as more details regarding the implementation of the Assessment are developed for the 2019 IEPR.

Sincerely,

Francesca Wahl
Sr. Policy Advisor, Business Development and Policy

⁴ Implementing AB 2127 CEC Staff Presentation, Slide 32.