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CalETC's General Comments on the Draft AB 2127 Report

Additional submitted attachment is included below.

CalETC
California Electric Transportation Coalition

February 26, 2021

California Energy Commission
Re: Docket No. 19-AB-2127
1516 Ninth Street
Sacramento, California 95814-5512

Submitted to on-line portal: https://efiling.energy.ca.gov/Ecomment/Ecomment.aspx?docketnumber=19-AB-2127

Re: General Comments on the CEC's Draft AB 2127 Report

The California Electric Transportation Coalition (CalETC) appreciates the opportunity to provide feedback on the Draft AB 2127 Report (Draft Report) on California's transportation future and the transition to zero-emission vehicles. We greatly appreciate the time and effort it took to organize the workshops and prepare this Draft Report. We will be submitting two comment letters on the Draft Report. This letter focuses on the charging forecast and the second letter focuses on ISO 15118 and networking.

CalETC supports and advocates for the transition to a zero-emission transportation future to spur economic growth, fuel diversity and energy independence, contribute to clean air, and combat climate change. CalETC is a non-profit association committed to the successful introduction and large-scale deployment of all forms of electric transportation. Our Board of Directors includes representatives from: Los Angeles Department of Water and Power, Pacific Gas and Electric, Sacramento Municipal Utility District, San Diego Gas and Electric, Southern California Edison, Southern California Public Power Authority, and the Northern California Power Agency. In addition to electric utilities, our membership includes major automakers, manufacturers of zero-emission trucks and buses, electric vehicle charging providers, autonomous electric vehicle fleet operators, and other industry leaders supporting transportation electrification.

1. CalETC supports the Draft Report's forecast for 1.5 million chargers to support 8 million EVs by 2030.

CalETC applauds the CEC for its detailed modeling effort that provides California with very important targets for electric vehicle (EV) charging infrastructure. We agree that 1.5 million chargers will be needed to support 8 million EVs by 2030 and we recommend that the final report emphasize this as the main target. CalETC's independent analysis supports this target.[1] Meeting the Governor's Executive Order N-79-20 to have 100% sales of zero-emission passenger cars and trucks by 2035 will require an "all hands-on deck" approach and CalETC's membership is motivated

[1] See CalETC's Whitepaper: *The Infrastructure Needs and Costs for 5 Million Light-Duty Electric Vehicles in California by 2030*. Available at: https://caletc.com/assets/files/EV-infrastructure-study-white-paper-FINAL.pdf.

to meet the challenge.[2] We will need to make some hard choices and significant investments to meet these goals, but we believe California can succeed and continue to be a leader in zero-emission transportation. The results of the Staff Report will be an invaluable tool in informing policy and planning processes to accelerate transportation electrification, and we recommend incorporating the insights from the AB 2127 work into the CEC's annual IEPR Demand Forecast to ensure utilities can appropriately plan the grid to support the anticipated charging needs.

CalETC provides the following suggestions regarding the modeling and hope that CEC staff can address these suggestions in either the final AB 2127 report or in the stand-alone reports on the individual models:

- It would be very useful to have more information on the average energy and range parameters of the EVs that were used in the model. This could be done in the context of providing a range of EVSE deployment numbers versus vehicle range scenarios. A 100-mile range vehicle will need much more public charging versus future vehicles which are projected to have over 300 miles of range.
- It would be useful if the EVI Road Trip model provided data for weekday versus weekend and overlay that with general grid loading conditions. However, this is less of a concern if EVI Road Trip charging peaks on weekends.
- The HEVI-LOAD analysis assumes that vehicles either charge at 50kW or 350kW, and we have seen numerous vehicles in these classes can charge at the 20 to 25kW level. So, it would be useful to broaden the power levels to include lower-level charging in the model.
- Additionally, it would be helpful if the HEVI-LOAD analysis provided details on how the fleet characterization is associated with model results because the charging patterns vary depending on the medium- and heavy-duty vehicle types, trip purposes, routes, and parking behaviors.
- Finally, it would be useful to clarify if the grid impacts model (EDGE) uses 100% name plate ratings for the overloading criteria versus standard utility practice to operate above those levels on occasion, how much time was spent in an overloaded condition (5 seconds, 5 hours, etc.), and what charging levels were assumed for L1, L2, DCFC, etc.

2. CalETC has concerns regarding the proposed "cost of enabled charging" concept. To the limited degree we understand this concept, which is not well understood by industry, NGO, and government experts, we believe it will be ineffective and harmful to affordable accessible charging infrastructure for all Californians.

We believe the "cost of enabled charging" concept, previously known as Transportation Electrification Regulatory Policies Act (TERPA), would not effectively enable low-cost charging solutions. We participated in the June and August 2020 workshops and have had follow-up meetings between CEC staff and CalETC's VGI experts on this concept. We do not understand how either the TERPA concept or the "cost of enabled charging" concept will effectively create access

[2] Governor Gavin Newsom Executive Order N-79-20; See https://www.gov.ca.gov/wp-content/uploads/2020/09/9.23.20-EO-N-79-20-text.pdf.

to affordable charging infrastructure and believe the complexity of the concepts could create barriers to access and increase costs. CalETC agrees with the CEC's recognition of the need to continue to support charger deployment via the inclusion of innovative business models and charging solutions. While there are promising new technologies and EV charging models that could accelerate electrification, program eligibility rules have yet to shift accordingly. CalETC recommends implementing its recommendations to improve the CALeVIP program to enable more shovel-ready charging projects receive public funding and encourage a busines model neutral approach to awarding funding that incorporates flexibility and innovation.[3] With some small improvements, CALeVIP can continue to be a great example of how the CEC can leverage public investment to accelerate private sector charging deployment.

3. **CalETC recommends the Draft Report include more discussion of how utility infrastructure programs can be used in the near- and mid-term to deploy infrastructure and leverage private investments.**

We support the CEC's analysis and conclusion that government and the utilities need to promote private investment to create a self-sustaining charging industry. The utility role should evolve over time, and there are many options and considerations (e.g., accelerating all types of transportation electrification (TE) per SB 350, impact on ratepayers, availability of public funds, new laws from the Legislature such as AB 841 and SB 676, and the potential for a distribution services market). We recommend the Draft Report explain the beneficial roles of utilities, government, and the private sector in advancing TE and VGI, and perhaps, shed light on the above complexities.

We greatly appreciate the opportunity to provide feedback on the Draft Report and thank you for consideration of our comments. Do not hesitate to contact me if you have any questions.

Best regards,

Kristian Corby, Deputy Executive Director

[3] See CalETC's Comments on the September 17, 2020 CALeVIP Workshop. Available at Docket 17-EVI-01: https://efiling.energy.ca.gov/Lists/DocketLog.aspx?docketnumber=17-EVI-01.