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**CPUC Public Advocates Office Comments on NEVI Deployment Plan**

*Additional submitted attachment is included below.*

BEFORE THE CALIFORNIA ENERGY COMMISSION AND  
CALIFORNIA DEPARTMENT OF TRANSPORTATION

National Electric Vehicle Infrastructure  
Deployment Plan Development,  
2022-26 for CEC and Caltrans.

Docket 22-EVI-03

**COMMENTS OF THE PUBLIC ADVOCATES OFFICE ON THE NATIONAL  
ELECTRIC VEHICLE INFRASTRUCTURE DEPLOYMENT PLAN  
DEVELOPMENT, 2022-26 FOR CALIFORNIA ENERGY COMMISSION AND  
CALIFORNIA DEPARTMENT OF TRANSPORTATION**

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June 28, 2022

## I. INTRODUCTION

The Public Advocates Office at the California Public Utilities Commission (Cal Advocates) submits these opening comments to the draft *California's Deployment Plan for the National Electric Vehicle Infrastructure Program* (NEVI Deployment Plan), issued June 6, 2022, developed by the California Energy Commission and California Department of Transportation (Caltrans).

Cal Advocates is the independent consumer advocate at the California Public Utilities Commission (CPUC). The mission of Cal Advocates is to advocate for the lowest possible rates for customers of California's regulated utilities consistent with safety, reliability, and the state's environmental goals. Cal Advocates proposes the following recommendations to promote synergies between the CPUC's ratepayer-funded utility transportation electrification (TE) programs and the NEVI Deployment Plan. Cal Advocates believes that promoting synergies between the NEVI Deployment Plan and utility TE programs will lead to lower electric vehicle (EV) infrastructure deployment costs and less redundancy in both programs.

## II. DISCUSSION

### A. **Reliable Integration Capacity Analysis Maps from the Investor-Owned Utilities (IOUs) Can Reduce Electric Distribution Upgrade Costs**

Siting charging stations carefully can save utility ratepayers potentially billions of dollars in avoided grid upgrade costs, since cumulative grid upgrade costs for the U.S. are estimated to be up to \$204 billion by 2050.<sup>1</sup>

CEC suggested at the NEVI Deployment Plan workshop that bidders for NEVI-funded projects should work with their IOU customer representatives individually to identify distribution upgrade needs for their proposed sites.<sup>2</sup> An alternative way for

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<sup>1</sup> E3 report on Distribution Grid Cost Impacts Driven by Transportation Electrification, 6/2021, p. 2, Figure 2. Accessed: [https://www.ethree.com/wp-content/uploads/2021/06/GridLab\\_2035-Transportation-Dist-Cost.pdf](https://www.ethree.com/wp-content/uploads/2021/06/GridLab_2035-Transportation-Dist-Cost.pdf)

<sup>2</sup> Q&A discussions in the Joint Workshop with the California Department of Transportation on the California State Electric Vehicle Infrastructure Deployment Plan (June 14, 2022).

bidders to identify potential EV charging station sites would be to use Integration Capacity Analysis (ICA) maps. These IOU-produced maps are intended to show locations in the IOUs' service territories where there is available electric grid capacity to host additional loads such as EV charging stations. Ideally, using these ICA maps, bidders can easily identify least cost routes to develop the Alternative Fuel Corridors. However, there are issues with the ICA maps that make them unreliable. The Interstate Renewable Energy Council (IREC) previously identified that the ICA maps have large discrepancies with the Grid Needs Assessment (GNA) maps.<sup>3</sup> GNA maps are similar to ICA maps, but instead of showing circuits and their available excess capacity, GNA maps show circuits that are forecasted to exceed their rated capacity in the near future.<sup>4</sup>

Fortunately, the CPUC has initiated two processes for ICA map improvements. A CPUC Administrative Law Judge (ALJ) issued a ruling on September 9, 2021 for the IOUs to refine the ICA maps.<sup>5</sup> This ruling included an annual process for the IOUs to report on their progress on ICA improvements. The other process is occurring within the CPUC's High Distributed Energy Resources Rulemaking (R.) 21-06-017 that is focused on "Data Portal Improvement."<sup>6</sup> These data portals are sites hosted by each IOU and includes how the ICA can be improved. Cal Advocates supports continuing these efforts to improve the ICAs and increase their broader usability in terms of implementing the NEVI Deployment Plan.

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<sup>3</sup> IREC Proposals for Refinements of the Load Integration Capacity Analysis (May 28, 2021), pp. 3-4. "While the methodologies of the two studies were not designed for comparison, the widely divergent results (even considering the recent improvement in PG&E's results) nevertheless highlights the need to investigate whether the Uniform Load results accurately reflect the available capacity for new load." Accessed at: <https://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M386/K579/386579599.PDF>

<sup>4</sup> Rulemaking (R.) 14-07-013, p. 36. "The GNA will present a report of the grid needs that result from the annual distribution planning process. Each grid need shall be characterized by the following attributes: ... Anticipated season or date by which distribution upgrade must be installed ... Forecasted percentage deficiency above the existing facility/equipment rating over five years." Accessed at: <https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M209/K858/209858586.PDF>

<sup>5</sup> Rulemaking (R.) 14-07-013, Administrative Law Judge's Ruling Ordering Refinements to Load Integration Capacity Analysis (Filed Sep 9, 2021), Ruling 2, p. 11. Accessed at: <https://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M405/K069/405069132.PDF>

<sup>6</sup> R.21-06-017 Assigned Commissioner's Scoping Memo and Ruling (Filed Nov 15, 2021), p. 14. Accessed at: <https://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M422/K949/422949772.PDF>

**B. Prioritize projects in low-income or disadvantaged communities**

Proposals for electric vehicle charging infrastructure projects within disadvantaged (DAC) and low-income communities should be considered separately from other projects, and ranked based on the project’s benefit/cost ratio. This prioritizes projects with the highest benefits per unit cost within these communities. In the NEVI Deployment Plan, the CEC and Caltrans currently propose to dedicate at least 50 percent of the budget (approximately \$192 million) for projects that serve California-designated DAC and LI communities.<sup>7</sup> While the NEVI Deployment Plan provides details on how the CEC and Caltrans intend to monetize project benefits such as reductions in nitrogen oxides (NO<sub>x</sub>), greenhouse gas (GHG) emissions, and petroleum usage,<sup>8</sup> the Deployment Plan does not specify how projects will be ranked and prioritized. In order to identify the most cost-effective projects, it is important to compare each project’s benefits to its cost. With a majority of California designated as either California-designated DAC/LI communities, Justice40-designated DACs, or both,<sup>9</sup> this process will help prioritize projects with the highest benefit/cost ratio.

Respectfully submitted,

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<sup>7</sup> Deployment Plan, p. 42.

<sup>8</sup> Deployment Plan, p. 45.

<sup>9</sup> Deployment Plan, p. 42, Figure 6: Disadvantaged and Low-Income Communities and Federally Recognized Tribes.