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Docket Number:	22-ALT-01
Project Title:	2022-2023 Investment Plan Update for the Clean Transportation Program
TN #:	246425
Document Title:	Dana Boudreau Comments - Parallel T&D investment planning vital for success
Description:	N/A
Filer:	System
Organization:	Dana Boudreau
Submitter Role:	Public
Submission Date:	10/11/2022 10:16:04 AM
Docketed Date:	10/11/2022

*Comment Received From: Dana Boudreau
Submitted On: 10/11/2022
Docket Number: 22-ALT-01*

Parallel T&D investment planning vital for success

Dear CEC staff, thank you for ongoing leadership to transition California toward a clean transportation future. For the Clean Transportation Program to be successful, parallel planning efforts for transmission and distribution services are critical to ensure that they are capable of accepting new electric load growth resulting from transportation electrification:

• California currently relies on aging transmission and distribution systems in varying states of repair.

• IOUs are preoccupied with climate-driven repair and hardening activities, an ongoing reality as climate change accelerates and infrastructure continues to degrade.

• If IOUs fail to invest thoughtfully and rapidly in transmission and distribution infrastructure it will impede the majority of state and local electrification and decarbonization goals.

• Regarding electric vehicle goals, transmission and distribution constraints are an existing barrier to the ability of state and local jurisdictions to install charging infrastructure to meet the CARB's mandate of no new internal combustion passenger vehicles by 2035. For example, in Humboldt County we have transmission lines and distribution segments with zero additional capacity.

• This problem will become more acute for medium- and heavy-duty vehicles with their larger capacities and need for both depot and distributed charging facilities.

• Transmission and distribution upgrades are multi-year efforts taking up to 10+ years to complete depending on complexities such as utility rights-of-way, existing interconnection queues, broad grid congestion issues, derated systems based on climate threats, and so on.

Please evaluate any and all opportunities to align CTP efforts with transmission and distribution capacity planning and implementation to ensure that electricity is available when and where it is needed to successfully support and deliver our local and state transportation decarbonization goals.

Respectfully,

Dana Boudreau
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