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Additional submitted attachment is included below.



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California Energy Commission
Deputy Director Hannon Rasool
Fuel and Transportation Division
Docket Number 19-AB-2127
715 P Street
Sacramento, CA 95814

Re: Pacific Gas and Electric Company Comments on the Second Biennial Assembly Bill (AB) AB 2127 and Electric Vehicle Infrastructure Projections (EVI-Pro) Analysis (Docket Number 19-AB-2127)

Deputy Director Rasool,

Pacific Gas and Electric Company (PG&E) appreciates the California Energy Commission (CEC)'s time to host a workshop on September 19, 2022, to share plans for the development of the AB 2127 Assessment, introduce scenarios and analysis, and present the EVI-Pro 3.

PG&E supports the CEC efforts to develop a second Assembly Bill (AB) 2127 Assessment of the charging infrastructure needed to achieve the goal of five million zero-emission vehicles (ZEVs) on the road by 2030. PG&E also supports the CEC's efforts to achieve the goal in the Executive Order (EO) N-79-20 and its direction to expand this assessment to support the levels of electric vehicle adoption required by the Order.

PG&E appreciates the opportunity to provide early feedback on the Electric Vehicle Infrastructure-Projection Tool (EVI-Pro) model's inputs and assumptions. PG&E offers the following comments related to the gap analysis and the alignment of this Assessment with those similar efforts that the California Air Resources Board (CARB) is undertaking.

Modelling and analysis under EVI-Pro and EVI RoadTrip

PG&E appreciates and commends the CEC for undertaking different scenarios under the EVI—Pro model and the EVI-RoadTrip to highlight charging demand and charging infrastructure needed to support the forecast scenarios in the AB 2127 assessment. As indicated in the workshop, initial modelling of EVI-Pro and EVI-RoadTrip have highlighted what was referred to as a "utilization gap," where EV charging infrastructure that is necessary to meet coverage requirements is likely to see low utilization rates until electric vehicle adoption increases.

PG&E encourages the CEC to further quantify this occurrence and investigate solutions to serve these near-term gaps, as Direct Current Fast Charger (DCFC) sites along rural corridors often require large capacity projects to serve. This further quantification will enable utilities to better plan for future DCFC load, as the load forecasts that utilities plan will account for the increased load driven by increased projected site utilization based on higher vehicle adoption in later years. Similarly, the Integrated Energy Policy Report (IEPR) hourly load forecasts only include impacts to the net system peak, which will not account for the total power capacity needed to serve peak utilization times of various charging infrastructure sites. As an example, utilities must plan to serve times of high residential charging as well as high public charging (i.e. high travel days), which can require redundant capacity to serve dynamic EV load across various charging scenarios.

Alignment with CARB's Transportation Electrification Modeling

For both light duty and medium-and heavy-duty vehicles, PG&E recommends the CEC aligns at least one scenario in the AB 2127 Assessment with CARB forecasts and models, such as the mobile source strategy (MSS) and Scoping Plan's Proposed Scenario. If the AB 2127 Assessment uses scenarios that do not align with CARB's scenarios, it would be useful for the CEC to articulate how the CEC's scenarios compare to CARB's air quality and climate policy goals. For example, it would be helpful to understand if the CEC expects a potential shortfall in medium-and heavy-duty vehicle electrification relative to CARB's goals.

PG&E appreciates the time and effort that the CEC took to organize the workshop, and the opportunity to provide initial feedback on the AB 2127 Assessment plan. Please do not hesitate to contact me if you have any questions.

Sincerely,

Licha Lopez