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PG&E Comments on the 2022-2023 Proposed Clean Transportation Investment Plan

Additional submitted attachment is included below.

Pacific Gas and Electric Company

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October 25, 2022

California Energy Commission
Electric Vehicle Charging Infrastructure Program
Docket Number 22-ALT-01
715 P Street
Sacramento, CA 95814

Re: Pacific Gas and Electric Company Comments on the CEC's 2022–2023 Investment Plan Update for the Clean Transportation (Docket Number 22-ALT-01)

Pacific Gas and Electric Company (PG&E) appreciates the California Energy Commission's (CEC) efforts in developing a substantial 2022-2023 Investment Plan Update for Clean Transportation. PG&E also appreciates the opportunity to provide feedback on the proposed funding allocations included in the revised staff report version of this Investment Plan.

PG&E applauds the investments of the CEC to decarbonize the transportation sector and recognizes that these investments respond to the priorities determined by the state's laws, executive orders, regulations, and other funding programs to reduce greenhouse gas emissions. Much of this funding is allocated to electric vehicles (EV) themselves (passenger, light duty, medium and heavy duty, drayage trucks, transit, and school busses) and their related charging infrastructure.

However, PG&E proposes that the CEC recognize in its Clean Transportation Investment Plan the critical role utilities play, and the investments needed, to provide the grid capacity to facilitate EV charging infrastructure. Electric utilities have the critical responsibility of accommodating increasing electric loads while at the same time keeping electricity rates affordable so that electrification efforts will be embraced by our customers and be inclusive and equitable. PG&E agrees with the CEC that the transition to clean energy needs to be fair and just.

PG&E is committed to transportation electrification and is similarly investing millions of dollars in customer EV infrastructure programs. These investments have provided charging infrastructure for passenger and fleet vehicles in low-income communities, at schools, and state parks. In addition, we are developing specialized EV rates and offering vehicle rebates. As the Revised Investment Plan sets forth at Page 35, investor-owned utilities (IOUs) collectively hold $1.48 billion in authorized unspent funding, primarily for customer-side EV infrastructure, which is scheduled to be deployed over the next 5 years.

In addition to customer-side investments, most importantly, PG&E is preparing the grid to efficiently and effectively enable widespread transportation electrification. Accommodating these increased loads requires electric utilities to undertake substantial investments in the grid's local distribution capacity (e.g. reconductoring transmission and distribution lines, upgrading transformers) to flow more power to those locations where charging stations will be deployed. As the Revised Investment Plan further explains, following the passage of AB 841, utility-side EV infrastructure will also be funded by customers through additional spending in the IOUs' general rate case. These investments are occurring at a time when large investments in grid modernization and wildfire mitigations like grid hardening and undergrounding, are already pushing electric rates to higher levels.

In light of these required investments in the electric system and the significant IOU customer investments in customer-side EV charging infrastructure, PG&E believes IOUs should be eligible for state and federal transportation electrification funds to help speed electric capacity investments.

As it is the function of the CEC's Clean Transportation Investment Plan to identify funding priorities, PG&E believes it would be appropriate that the Plan be amended to include the following language in the middle of page 35 at the end of the section headed, "Investor-Owned Utility Investments in Electric Vehicle Charging Infrastructure":

> "In light of the substantial investments utility customers have made and will continue to make in transportation electrification, utilities should be eligible for state and federal funding to help ease rate pressures. Without affordable electric rates, our goals could be stymied just as we are beginning to make great progress."

PG&E appreciates that the CEC Investment Plan allows their clean transportation program to be responsive to gaps in investments and can shift funds to address those gaps. PG&E welcomes the opportunity to collaborate with the CEC to explore the possibility of incorporating this critical grid capacity work in the Clean Transportation Investment Plan. This will help the State achieve its goals in a more affordable and expeditious manner.

Please do not hesitate to contact me if you have any questions.

Sincerely,

/s/
Licha Lopez