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**PG&E Comments on Community Benefits of the CEC's Clean
Transportation Program**

Additional submitted attachment is included below.



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December 16, 2022

California Energy Commission
Deputy Director, Hannon Rasool
Fuel and Transportation Division, Clean Transportation Program
Docket Number 22-TRAN-03
715 P Street
Sacramento, CA 95814

Re: Pacific Gas and Electric Company Comments on the Clean Transportation Program Community Benefits (Docket Number 22-TRAN-03)

Dear Deputy Director Rasool,

Pacific Gas and Electric Company (PG&E) appreciates the California Energy Commission's (CEC) for hosting a workshop to discuss and receive stakeholder feedback on how to define, measure, and improve the benefits provided to communities by the CEC Clean Transportation Program (CTP). PG&E also appreciates the opportunity to provide feedback on how the CEC's effort can ensure that CTP projects are not only located in disadvantaged and low-income communities, but also that these communities benefit from CTP investments.

PG&E applauds the CTP investments of over \$2 billion in funding for a broad spectrum of zero-emission vehicles and infrastructure, alternative fuels and technologies, and workforce development projects. PG&E also acknowledges that the CEC seeks to invest more than 50 percent of CTP funds in its 2022-2023 Investment Plan toward projects that benefit low-income and disadvantaged communities.

This commitment will ensure that CTP investments are made in an equitable way that enables all Californians to embrace transportation electrification. However, as discussed in PG&E's previous comments¹ on the CEC's 2022-2023 Investment Plan and acknowledged by the CEC in their final Investment Plan² released on November 29, investments in grid infrastructure are also critical to ensure that Electric Vehicle Service Equipment (EVSE) can be interconnected and energized.

PG&E recommends that for the next cycle, the Investment Plan not only recognize the need for utilities' eligibility for grid capacity investments, but that it also allocates actual funding to accommodate the

¹ [PG&E Comments on the 2022-2023 Proposed Clean Transportation Investment Plan, https://efiling.energy.ca.gov/GetDocument.aspx?tn=246808&DocumentContentId=81150](https://efiling.energy.ca.gov/GetDocument.aspx?tn=246808&DocumentContentId=81150)

² [2022-2023 Investment Plan Update for Clean Transportation Program - Lead Commissioner Report, https://efiling.energy.ca.gov/GetDocument.aspx?tn=247782&DocumentContentId=82085](https://efiling.energy.ca.gov/GetDocument.aspx?tn=247782&DocumentContentId=82085)

increased load(s) required by EV charging stations. Actual funding allocated to electric utilities will facilitate substantial investments in the grid's local distribution capacity (e.g., reconductoring transmission and distribution lines, upgrading transformers, etc.) to flow more power to these charging station locations.

Upon the CEC's allocation of actual funding dollars to electric utilities, community benefits can immediately be measured by the continuity and consistency of affordable electricity rates resulting from these investments and the absence of pricing spikes. Similarly, these electrification efforts can be measured by the number of customers that will then embrace EVs and more equitable EV-adoption.

Without capacity upgrades, EVSE cannot be connected to the grid and communities will not experience the benefits of EV charging identified in the forthcoming framework. Because of the critical nature of capacity upgrades in bringing the benefits of EV charging to disadvantaged and low-income communities, it is imperative – for both the success and equitability of the program – that utility upgrades are eligible for funding under the CTP. Moreover, capacity upgrades designed to serve a charging station can additionally serve other areas of a community, and thus extend the communities' ability to use excess capacity to fulfill other needs. . Ultimately, investing in EVSE in conjunction with the capacity upgrades needed to service this equipment can unleash multiple benefits to the community, producing an even more positive impact where these investments are made.

PG&E appreciates that the CEC's Clean Transportation Program can be more responsive to investment gaps and can shift funds to address those deficiencies on a nimble and timelier basis. 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 and, ultimately, 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