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Forum Letter_CEC Interconnection

Additional submitted attachment is included below.



May 31, 2023

California Energy Commission
715 P Street
Sacramento, CA 95814

RE: Commissioner Workshop on Clean Energy Interconnection – Electric Distribution Grid

Dear Energy Commission Staff,

Thank you for the opportunity to provide feedback on the recent Commissioner Workshop on Clean Energy Interconnection – Electric Distribution Grid. Forum Mobility (Forum) supports the Commission's efforts to accelerate processes and timelines for interconnection and energization of clean energy resources, including chargers for medium- and heavy-duty electric trucks.

Forum Mobility, headquartered in Oakland, California, provides turn-key zero-emission trucking solutions to help accelerate the deployment of zero-emission drayage trucks throughout California. Many smaller fleets and independent owner operators face barriers to adoption, including awareness of zero-emission vehicle options, the high up-front cost, navigating the incentive programs, and installing the associated infrastructure. Forum helps overcome these barriers to adoption by developing, building, and operating the charging infrastructure, as well as purchasing and leasing class 8 zero-emission electric trucks – with the ability to secure available incentives to pass along to the truck driver or fleet owner. Forum provides a one-stop solution for a monthly fee for 'charging as a service' and/or 'truck as a service.' We currently have 8 depots under development that will support roughly 600 trucks in and around the ports of Oakland, Long Beach, and Los Angeles, and along corridors to common freight destinations.

Scaling medium and heavy duty charging at the speed and scale demanded by California's policies will require fundamentally new business models than what exists for light duty vehicles, and success will require new approaches to interconnection.

Recent CEC analysis (as per AB 2127 study) projects that CA will need 157,000 chargers to support the 180,000 medium- and heavy-duty vehicles anticipated for 2030. Reaching that will require an average installation rate of about 53 MHD chargers a day through 2030, and that average increases to north of 200 per day from 2030 through 2045.

Siting MHD charging requires land that is 1) owned or under at least a 10-year lease; and 2) has access to massive amounts of power on its distribution feeder. For existing fleets, the Venn overlap of these two conditions is depressingly small, which means that to meet near term targets a significant amount of charging will have to occur at third-party depots.

The customer demands and economics of third-party depots drive to size in the 3-15 MW range. California will need to overhaul many of our existing distribution planning and interconnection processes to better serve the siting and development of third-party depots.

We suggest below some issues to address. The first two are short-term issues around transparency and business processes; the third is a medium-term opportunity to maximize utilization of existing distribution system; and the fifth is a longer-term encouragement for proactive investment.

1. ICA maps are outdated and inaccurate, and feasibility study process in some utility territories unreasonably expensive and lengthy

While the maps ostensibly exist to provide support for making siting determinations, the information provided is not of sufficient accuracy to provide for investment decisions – indications of power availability do not necessarily mean. Increasing the accuracy of the information in the ICA maps would be very helpful. In most instances, utilities require a feasibility study in order to determine with certainty the amount of power available. If an application is submitted through the Make Ready programs, the cost of the feasibility study is included in the application. However, if you want to develop a site and need to determine how much power is available outside of the program, then you have to pay for a feasibility study. In SCE territory, feasibility studies cost \$2000 and are delivered in 30 business days. For PG&E, the cost is often upwards of \$30k, and the timeline is upwards of 6 months. This is not a sustainable process for businesses looking to build charging depots at the necessary speed and scale.

2. Process for securing power is a Catch 22.

If a feasibility study indicates that power is in fact available at a site, a utility will not reserve the power unless a developer has site control. At the same time, developers do not want to buy land or sign a long term lease unless the site has guaranteed power. As it currently stands, the process holds a structural risk between identifying power availability and securing it.

We propose two potential solutions: 1) utilities could allow developers the ability to begin the interconnection application process under Rule 29 by paying a deposit in lieu of site control, then transfer the interconnection application to the Charge Ready Transport Program once the site control agreement has been confirmed, and still receiving incentives that are available under Charge Ready. 2) An alternate approach: allow applicants to begin the process under Charge Ready by paying a deposit in lieu of site control. That way the rebates are already included in the program if an applicant obtains site control and gets that deposit back and continues through the process without delay. We understand that utilities need to protect their interests and expenditures, and believe a deposit can play that role.

3. Maximizing Utilization of Distribution Feeders

Maximum capacity limits assume coincident peak loads. But what if the loads aren't coincident? Can we use usage tariffs or protective relays to maximize the load that can be served by existing infrastructure? Doing so would serve two public benefits: it would allow for more charging infrastructure to be built more quickly, without depending on utility upgrades; and it would

lower impacts on ratepayers. Forum would welcome load hosting capacity set in blocks that are hourly and seasonal so long as it is predictable and predetermined. For example, a site may have 5MWs of capacity year-round between 9pm and 4pm the following day but only 1MW between 4pm and 9 pm in the summer months. Given the that the recent "Electrification Impacts Part 1" study that Kevala did for the CPUC estimated a high end of \$50 B of distribution system investments absent such measures, making more efficient use of the existing system should be a top priority.

4. Proactive Investments in Freight Corridors

Right now, distribution feeder investments are made on a load-following basis. This results in a system where requests for upgraded service can take 5 years. With policy requiring massive electrification of transportation, utilities should be able to make proactive investments in areas where we know we'll need it. We believe it will be important and beneficial to find a path that serves proactive building and addresses ratepayer advocates' concerns.

Forum greatly appreciates the opportunity to provide input on CEC's Commissioner Workshop on Clean Energy Interconnection. With the state's ambition climate change and ZEV vehicle deployment goals, continued support from the CEC to accelerate the interconnection and deployment of infrastructure will be a key to success. We look forward to continuing to work with the CEC and other stakeholders to accelerate the deployment of clean transportation and freight throughout the state.

Sincerely,

Adam Browning
EVP Policy and Communications
Forum Mobility