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Electric Vehicle Infrastructure Project Funding

Additional submitted attachment is included below.

Date: August 8,2023

To: Taylor Marvin
Taylor.Marvin@energy.ca.gov
California Energy Commission
715 P Street
Sacramento, CA 95814

Re: **THE MATTER OF: Electric Vehicle Infrastructure Project Tracker**

23-TRAN-02: Response submitted via email to docket@energy.ca.gov; Subject Line 23-TRAN-02 Electric Vehicle Infrastructure Project Funding

Taylor Marvin:

East Bay Community Energy (EBCE) is pleased to provide these "Comments of East Bay Regarding the Electric Vehicle Infrastructure Project Tracker Workshop." EBCE responds to this workshop given our focus on accelerating the rapid expansion of electric vehicle (EV) charging infrastructure across our service area, and experiences collecting data to inform EV charging infrastructure deployment.

Introduction

EBCE secures electrical energy and manages energy-related climate programs including Transportation Electrification (TE), on behalf of our Joint Power Authority (JPA) member communities (cities, towns, county). As the nonprofit public power provider and default load-serving entity (LSE), EBCE delivers electricity with higher renewable energy content at a reduced cost to customers through the incumbent investor-owned utility's (IOU) transmission and distribution system. With respect to permitting, EBCE has long been an advocate for streamlined permitting and has worked diligently with our municipal partners to achieve 100% compliance with AB 1236 and AB 970, working closely with the Governor's Office of Business and Economic Development to do so. Leveraging these and other experiences, EBCE provides the following feedback to the workshop.

I. ***Comments***

Create a New "Step One"

EBCE encourages CEC to revise its proposed "Step 1" to focus on IOU service planning processes rather than Authority Having Jurisdiction permitting. For many EV charging projects,

including direct current fast charging and substantial fleet charging projects, IOU service planning is generally required and intended to confirm whether the electric distribution system has capacity to meet the load of the project as proposed. It has been EBCE's experience that IOU service planning is a critical hurdle in deploying EV charging infrastructure near term.

To begin the IOU service planning process, charging infrastructure developers (public and private sector) must first spend resources for an engineer to draft a project design that meets the IOUs requirements for service planning review. They then submit the drawing along with an application and $3,500 fee to the IOU who over a 4–6-week term will review the applicants information before confirming if the site has the required capacity to meet the project scope.

At the core of the issue associated with IOU service planning is the IOU Integration Capacity Analysis maps (*ICA Map*). ICA Maps were developed to assess generation, not for identifying opportunities for new load. While the intention of the ICA Maps is to help find information on potential project sites for Distributed Energy Resources, the data on these maps is illustrative at best and changes constantly due to the nature of new load requests from contractors of all kinds, not just EV charging infrastructure developers (data centers, new housing, hospitals, retail, etc.). Only the IOU has insight on requests for new load, and the ICA Maps, particularly in Pacific Gas and Electric Company's (PG&E) electric distribution system service territory, are not kept up to date with real time information that is useful to project developers trying to determine if a site is viable or not.

For example, EBCE has applied for and received grants from the CEC and other funding agencies to support deployment of a public EV fast charging network. EBCE selected sites for inclusion in our grant proposals because PG&E's ICA Map indicated the circuits in the project areas were "green" or had available capacity. Once EBCE executed its grant agreements with the respective funding agencies, it was able to invest in engineering services to develop project designs and submit those to PG&E service planning to confirm available capacity. However, once PG&E reviewed our applications (which typically takes 4-6 weeks) they confirmed the capacity wasn't available at all, or that only a fraction of the capacity needed for the scope and scale of the project was available. That is, the ICA Map had not been updated to reflect requests for load from other projects and there was no way EBCE could have known what the condition of those circuits were in real time without engaging in PG&E's service planning process. Further, PG&E confirmed the capacity EBCE requested for each of its projects associated with grant funding wouldn't become available for 4-7 years.

Additionally, in June 2023 EBCE invested in engineering services to develop project drawings for a new project site based on its review of the ICA Map which indicated there was plenty of capacity available. EBCE submitted the required service planning application to PG&E (with $3,500 fee), and were informed that the circuit didn't have capacity despite being green on the ICA Map. In fact, the last update to the ICA Map for that circuit by PG&E was 1+ year ago.

As a result of these and other examples, EBCE has had to cancel projects (both grant and non-grant funded) altogether or replace project sites included in a grant proposal with alternate sites. Alternate sites associated with grant funded projects had to meet the funding agency's grant solicitation requirements (ex. multifamily housing residents served, equity priority communities, minimum capacity or number of EV chargers) which takes time and resources for a grantee to

identify. The grantee then needs to go through the IOU service planning process again just to confirm whether the alternate sites actually have available capacity or not.

This process is incredibly inefficient. For some private sector infrastructure developers, this inefficient process is *"just the cost of doing business*". That is, they have resources to develop as many speculative projects designs as possible and submit them to PG&E's service planning process with the prospect that one will have the available capacity necessary.

However, for not-for-profit organizations and local governments, who are often the same entities eligible for grant funding opportunities from the CEC, this inefficient process is not a good use of valuable public resources. These stakeholders should not be put in a situation where they must absorb substantial costs to validate capacity at a site. Further, CEC staff should not be put in a position where for every grant agreement they are administering they must track delays rooted in IOU ICA Map and service planning inefficiencies.

Rather, the IOUs should be held accountable and be required to improve the ICA maps, so they reflect real-time information about capacity at any given site. EBCE is aware that the California Public Utilities Commission (CPUC) has directed the IOUs to improve upon the ICA Maps and that those improvements may not be realized until as late as Quarter 1, 2025.

It is likely with the amount of grant funding CEC and other agencies are preparing to issue and eventually award, that grantees will find themselves in a situation where they propose a charging infrastructure project that won't be viable for development due to grid constraints. It is important for CEC to recognize this potential issue and create a new "Step 1" in its proposed Project Tracker which focuses on the biggest delay of all, IOU service planning. EBCE also encourages CEC to coordinate with the CPUC to understand when improvements to the ICA Maps will be made by the IOUs that result in valuable real time data that better informs EV charging infrastructure developers and stakeholders.

Conclusion

EBCE thanks the CEC for the opportunity to provide these comments. We encourage the integration of the following concepts:

- *Revise "Step 1" to focus on IOU service planning and capacity issues, which can substantially delay or cancel charging infrastructure projects.*

Please reach out to Paul D. Hernandez, Principal Regulatory Manager, Transportation Electrification, with any questions or for clarification regarding these comments (phernandez@ebce.org).

Respectfully Submitted,

-Paul D. Hernandez

Principal Regulatory Analyst, Transportation Electrification
East Bay Community Energy