

<b>DOCKETED</b>	
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*Comment Received From: CalETC*  
*Submitted On: 8/9/2023*  
*Docket Number: 23-TRAN-02*

**on Proposed EV Infrastructure Project Tracker**

*Additional submitted attachment is included below.*



August 8, 2023

California Energy Commission  
Re: Docket No. 23-TRAN-02

*Submitted via electronic commenting system for docket 23-TRAN-02*

### **Re: Proposed EV Infrastructure Project Tracker**

The California Electric Transportation Coalition (CalETC) appreciates the opportunity to provide comments on the proposed EV Infrastructure Project Tracker (Tracker Tool). CalETC supports and greatly appreciates Staff's commitment to identifying and working to overcome barriers to installing EV infrastructure in the state.

CalETC supports and advocates for the transition to a zero-emission transportation future to spur economic growth, fuel diversity and energy independence, contribute to clean air, and combat climate change. CalETC is a non-profit association committed to the successful introduction and large-scale deployment of all forms of electric transportation. Our Board of Directors includes representatives from: Los Angeles Department of Water and Power, Pacific Gas and Electric, Sacramento Municipal Utility District, San Diego Gas and Electric, Southern California Edison, Southern California Public Power Authority, and the Northern California Power Agency. In addition to electric utilities, our membership includes major automakers, manufacturers of zero-emission trucks and buses, electric vehicle charging providers, autonomous electric vehicle fleet operators, and other industry leaders supporting transportation electrification.

CalETC supports the creation of a Tracker Tool for CEC grant-funded projects and believes the CEC is asking the right questions regarding how best to eliminate barriers to timely construction of charging infrastructure. Like any construction project, electrical infrastructure installations can be complex and time consuming, with conditions unique to each site influencing approval timelines considerably. Among the most influential are:

- Early engagement of the utility in the project planning process
- Property ownership
- Site electrical capacity and utility-side infrastructure upgrades required
- Availability of utility equipment, such as transformers, and labor resources
- Clarity of utility energization or interconnection processes for EV charging projects
- Attainment of necessary easements

Projects with the shortest path for electrification generally include characteristics such as: involving the utility early in the planning phase, the site owner and the project proponent are one and the same, there is sufficient electrical service at the site or the site requires minimal utility-side upgrades, utility equipment and resources are in robust supply, the utility energization processes

for EV charging projects are sufficiently clear, the authority having jurisdiction (AHJ) has streamlined permitting processes, and the AHJ has sufficient staff resources to promptly review permit applications. Conversely, projects for which the utility was engaged late in the planning process, where the site host and project proponent are distinct entities with competing objectives, require extensive utility-side upgrades, where utility equipment and resources are in short supply, where EV charging energization or interconnection processes are less well-developed, or where the AHJ does not adhere to streamlined permitting often results in longer timelines.<sup>1</sup> The Tracker Tool should help the CEC and stakeholders better understand the timelines within the EV charging infrastructure energization process and where barriers and delays may occur, which may include emergency or other unanticipated priority utility work required for safety and reliability. This information will be useful for identifying why the delays occur and steps that can be taken to improve and shorten the process.

#### Reporting: Timing and Data Points

To the extent possible, CalETC supports automating data collection for the Tracker Tool. If reporting cannot be automated, we recommend requiring reporting on an annual basis and in coordination with the CEC's billing cycles so grantees can complete both processes at once. In addition to annual reporting, the CEC could require reporting of certain significant events at the time they are completed. These significant events would include:

1. AHJ permit submittal date for both utility and customer side, if applicable
2. AHJ permit approval/denial date(s)
3. Date easement is requested and completed, if applicable
4. Customer provides utility with a complete service request application submittal, which may include but is not limited to final customer deposit, final design, layout, single-lines, and load calculations
5. Utility provides preliminary design and date customer approves
6. Customer construction start and complete dates
7. Utility electrical construction start and complete dates
8. Meter energization date
9. EVSE activation date

Additional data points that would be useful to collect include whether load management, bidirectional charging, solar or storage are being used, which also implies whether the project requires interconnection, not just energization. We also recommend including an "other" category where grantees can explain problems they are having in the field. For example, we have heard from a medium- and heavy-duty charging provider that an AHJ is requiring a conditional use permit for "storing trucks" at a site, which is not contemplated by AB 1236, the permit streamlining law.

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<sup>1</sup> See *Electric Utility Interconnection Timelines for EV Charging – Discussion Draft* for more information (available at: <https://caletc.com/assets/files/Electric-UtilityInterconnectionTimelinesforEVCharging-DiscussionDraft.pdf>.)

### Web Dashboard

CalETC recommends that the web dashboard summarize data by AHJ, similar to GO Biz's permit streamlining map.<sup>2</sup> We also recommend allowing users to categorize the projects on the web dashboard based on a variety of project characteristics. Timelines for completing charging infrastructure projects can vary significantly depending on the size, location, uniqueness of a project, and the existing utility- and customer-side electricity infrastructure. Giving users of the dashboard an ability to select certain criteria that reflects their project and goals will provide insights about the challenges and lessons learned from similar projects.

### Noticing Feature

CalETC supports the concept of an automated noticing feature as a way of informing stakeholders that a significant event has been completed. The energization process involves passing the responsibility back and forth between multiple interested stakeholders – grantee, utility, AHJ, etc. – so an additional notice, while it may be redundant in certain instances, would be valuable to ensure the responsibly party knows when it is their turn to move the process forward.

Thank you for your consideration of our comments. Please do not hesitate to contact me [kristian@caletc.com](mailto:kristian@caletc.com) should you have any questions.

Sincerely,

A handwritten signature in blue ink, appearing to read 'K. Corby', with a long horizontal flourish extending to the right.

Kristian Corby, Deputy Executive Director  
California Electric Transportation Coalition

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<sup>2</sup> See <https://california.maps.arcgis.com/apps/webappviewer/index.html?id=5b34002aaffa4ac08b84d24016bf04ce>