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Peninsula Clean Energy Comments on Draft EV Charging Reporting Regulations

Additional submitted attachment is included below.

October 24, 2023

California Energy Commission
715 P St.
Sacramento, CA 95814

Re: Docket 22-EVI-04 - Peninsula Clean Energy Response to Draft Regulations for Improved Inventory, Utilization, and Reliability Reporting

Dear California Energy Commissioner's and Staff,

Peninsula Clean Energy Authority (PCE), the not-for-profit Community Choice Aggregation (CCA) program for San Mateo County and the city of Los Banos, applauds the California Energy Commission (CEC) in its efforts to improve the tracking of electric vehicle (EV) charging station infrastructure deployment, utilization, and reliability, which are essential in meeting the state's EV adoption targets through a widely accessible and useful ecosystem of EV chargers.

PCE is supportive of this effort in concept and recommends that the state allow for data sharing, including confidential data collected, with public agencies, upon request, to help local agencies advance EV adoption and work cooperatively with the CEC to achieve California's aggressive and vital EV charging infrastructure deployment targets. Such confidential data sharing among state agencies is not new. The California Department of Motor Vehicles already shares confidential vehicle registration data with public agencies, including PCE. PCE relies upon this data to provide critical insights into EV adoption among the communities it serves, identify areas of the greatest need to assist the public to adopt transportation electrification (TE) technology, and inform the design of future TE programs.

The data proposed to be collected by the CEC will provide a complete picture of the EV charging infrastructure installed throughout the state. And this data set would be invaluable for local public agencies like PCE who have their own EV charging incentive programs[1] and targets for EV charging deployment for the communities they serve. Sharing data with public agencies responsible for deploying EV charging infrastructure would provide information vital to mitigating climate emissions and would further empowering local agencies to assist in the state meeting it's EV charging goals.

[1] See https://www.peninsulacleanenergy.com/ev-ready/

Based on currently available data, it appears as though California is unfortunately woefully short of meeting it's EV charging deployment targets. To support the Governor's Executive Order, which requires all new passenger sales to be zero emissions by 2035, AB 2127 directed the CEC to study the EV charging infrastructure needed to be deployed across the state by 2030. The CEC report[2] determined that California needs at least 1.2 million EV chargers by 2030. CalETC, a non-governmental organization, estimates in their white paper[3] that the true charging need is roughly 4 million to 6 million EV chargers by 2030. As of September 2023, there are fewer than 100,000 EV chargers in California[4], indicating that California needs to install at least 1.1 million and as many as 5.9 million EV chargers in the next 6 years to meet state EV targets. Though, by the CEC's own admission[5], private chargers are undercounted with current methodologies, and current inventories are incomplete. The more accurate data to be collected through these regulations will be crucial in helping state and local agencies understand the true EV charging deployment need.

Other key data points such as utilization and uptime are also important for local agencies with TE and Distributed Energy Resources (DER) programming for two reasons. First, these data will help inform the relative impact of certain EV charging stations vs others, including how EV chargers in disadvantaged communities are being used, in support of overall climate impact targets and equity goals. Second, these data can inform load growth projections, renewable energy targets such as PCE's 24/7 renewable energy target, and the potential load for load shifting to mitigate grid impact from the deployment of additional electric loads.

The data the CEC has proposed to collect will unlock a significantly more comprehensive understanding of EV charging for peer public agencies that share the mission to advance the state's EV goals and transportation decarbonization goals and such data sharing is not unprecedented. PCE strongly encourage the CEC to develop data sharing procedures for public agencies.

Phillip Kobernick
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Peninsula Clean Energy Authority

[2] https://www.energy.ca.gov/news/2021-06/report-shows-california-needs-12-million-electric-vehicle-chargers-2030
[3] https://www.caletc.com/assets/files/EV-infrastructure-study-white-paper-FINAL.pdf
[4] https://www.energy.ca.gov/data-reports/energy-almanac/zero-emission-vehicle-and-infrastructure-statistics/electric-vehicle
[5] https://www.energy.ca.gov/data-reports/energy-almanac/zero-emission-vehicle-and-infrastructure-statistics/electric-vehicle