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CalETC's Comments on MHD Energization Strategies in POU Service Territories

Additional submitted attachment is included below.

August 16, 2024

California Energy Commission
California Department of Transportation
Re: Docket No. 19-TRAN-02

Submitted electronically to https://efiling.energy.ca.gov/EComment/EComment.aspx?docketnumber=19-TRAN-02

Re: Staff Workshop on Innovative Strategies for Accelerating Medium- and Heavy-Duty Site Energization in Publicly Owned Utility Service Territories

The California Electric Transportation Coalition (CalETC) appreciates the opportunity to provide comments on the Staff Workshop on Innovative Strategies for Accelerating Medium- and Heavy-Duty (MHD) Site Energization in Publicly Owned Utility (POU) Service Territories held on July 31, 2024. CalETC would like to thank the CEC for all your hard work on developing this workshop and recognizing the challenges and successes fleets have encountered as access to reliable MHD EV charging infrastructure expands across 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, and other industry leaders supporting transportation electrification.

CalETC recommends the CEC work with the Building Standards Commission (BSC) to analyze whether the building codes for new industrial and commercial buildings can include increased requirements for electrical capacity for MHD charging or find opportunities to future proof the codes by, for example, requiring higher panel capacity or larger conduit. Finding ways to optimize the building codes can save significant costs in upgrades and retrofits after the buildings are constructed. Additionally, we recommend considering triggers for existing industrial and commercial buildings that are repaving or adding truck parking or upgrading the electrical system. These triggers would require the installation of MHD charging or futureproofing elements. For example, when repaving or adding parking a requirement could be to run conduit to the added or altered truck parking spaces, so it is ready when charging needs to be installed.

CalETC also recommends the CEC consider the following:

a. Collaborate with the Electric Power Research Institute (EPRI) to gather insights and data EPRI has collected on all utilities through the EVs2Scale program.
b. Develop tools for analyzing siting options particular to EVSE deployments.
c. Data sharing and standardization of common data fields, including facility types.
d. Best practices for sharing site capacity information with customers online.
e. Best practices for managing risks associated with critical energy infrastructure and cybersecurity, as well as the potential misinterpretation of capacity information by customers that could expose POUs to liability.
f. Financial and technical support for in-depth studies and analysis necessary to plan for future expansion of grid capacity.
g. Best practices for financing infrastructure projects including municipal joint powers authorities and energy infrastructure partnerships.
h. Best practices for "back-office" software and/or billing systems that:
    i. Support demand response and load management,
    ii. Support a variety of payment methods and interoperability,
    iii. Maximize flexibility to facilitate different payment models such as subscriptions, discounted charging for low-income customers, etc. and,
    iv. Minimize the need to deploy advanced metering infrastructure.

Thank you for your consideration of our comments. Please do not hesitate to contact me at kristian@caletc.com if you have any questions or would like to discuss our recommendations.

Kind regards,

Kristian Corby, Deputy Executive Director
California Electric Transportation Coalition