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Comments on Revised Utilization Data Collection

Additional submitted attachment is included below.

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January 10, 2025

Docket No: 22-EVI-04
California Energy Commission
715 P Street
Sacramento, CA 95814

RE: Comments on Staff Proposal for Electric Vehicle Charging Station Utilization Reporting Regulations

Dear Energy Commission Staff,

Tesla appreciates the opportunity to provide feedback in response to the Staff Proposal for Electric Vehicle Charging Station Utilization Reporting Regulations, which the California Energy Commission (CEC) has proposed to improve key inputs for the integrated energy policy report (IEPR) models.

Tesla supports the CEC's goal of more effective grid planning and energy investments and has been an active participant in the IEPR discussions at the CEC as well in the relevant proceeding at the California Public Utilities Commission (CPUC) in order to inform grid planning. One of the largest barriers to charger deployment is lack of distribution system capacity. For our part, Tesla engages with the utilities to provide advanced notice of charger deployment plans so that distribution investments can reflect upcoming customer needs. We generally agree that better planning is necessary to streamline project queues before bottlenecks form, and have been willing to share non-public information with the relevant stakeholders when it is both useful and necessary to address barriers to charger deployment.

That said, Tesla is deeply concerned with the proposal to require charging networks to submit session-level utilization data for all chargers operating in California as discussed in the December 18, 2024, workshop. As drafted, the proposal will establish onerous reporting obligations of sensitive, non-public information for all chargers in California. We recommend that the CEC eliminate the utilization reporting requirements for privately funded chargers from the regulation. As an alternative pathway to improve the inputs to IEPR models, the CEC should leverage the existing meter-level data reports generated by the three large California investor-owned utilities.

Session-level data is high-volume, sensitive, and overly granular.
Tesla owns and operates over 500 Supercharger sites in California, with hundreds of sessions occurring every day at each site. The updated data submission requirements would require network operators to transmit tens of millions of data entries to the CEC every quarter, which would be resource intensive even if the process is automated via API. Onerous reporting requirements are a diversion of resources that could otherwise be invested in growing the network, improving reliability, or lowering costs for drivers.

As Tesla has commented before, session level data is commercially sensitive, so there are broad reservations sharing it, even if it will be held confidential by the CEC.[1] It also seems that session level data is overly granular for the purpose of planning system-level investments because it would need to be aggregated by time and/or location to be useful in identifying trends in usage and driver behavior. We urge the CEC to consider how leveraging utility meter-level data could be a better pathway to achieve the same end goal. Generally, every new Supercharger site in California has its own new

[1] Tesla Comments on Second Draft Staff Regulations for Improved Inventory, Utilization, and Reliability Reporting, May 15, 2024. Available in docket no. 22-EVI-04.

service connection meaning that there is a separate utility meter that is tied to each site and can collect aggregate utilization data.

There is an alternate source for meter-level data available.
The three large investor-owned utilities (IOUs) in California are required to aggregate meter-level data for their EV charging customers to examine how charging behavior influences distribution system upgrade costs.[2] A public version of the IOUs' annual report was published in December 2024 and includes information such as monthly average kWh consumption data by customer type (DCFC, workplace, multi-family housing, transit/fleet), average hourly load profiles by weekday and weekend, and seasonal peak loads, among other insights.[3]

The IOUs' report indicates that there must already be an existing pipeline of relevant data for EV charging sites that could be used to improve IEPR. It would be unnecessarily duplicative for EV charging networks to divert resources to report session-level data when the CEC could instead leverage the IOUs' meter data. If the data of interest is not directly reported in the IOUs' compliance filings, there could be an opportunity to collaborate with the IOUs and/or the CPUC to improve the existing compliance reporting to be more useful for IEPR modeling.

This approach would be more cost-efficient, as it would consume fewer resources to modify the IOUs' existing data reports to suit the CEC's needs than to divert the charging industry with creating reporting tools. We strongly encourage the CEC to work with its sister agency to identify a solution to access IOUs' meter data for EV charging customers needed to improve IEPR and, in the interim, eliminate utilization data reporting from the draft regulation for privately funded EV charging equipment.

Thank you for the opportunity to submit comments. We appreciate the CEC's willingness to engage with stakeholders throughout this rulemaking process and look forward to the finalization of this regulation.

Sincerely,

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[2] CPUC Decision 16-06-011, Ordering Paragraph 2
[3] CPUC Docket R-23-12-00; PG&E, SCE, SDG&E Compliance Filing (December 13, 2024), available at: http://docs.cpuc.ca.gov/SearchRes.aspx?DocFormat=ALL&DocID=549795600