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**Significant Concerns Regarding the CAlLeVIP Program Timeline
and Final Utility Service Design Requirement**

Additional submitted attachment is included below.



Electric Era Technologies, Inc.
3847 1st Ave S Suite 101
Seattle, WA 98134

April 10, 2025

Subject: Significant Concerns Regarding the CALeVIP Program Timeline and Final Utility Service Design Requirement

Dear Commissioners and Staff of the California Energy Commission,

We are writing to bring your urgent attention to our significant concerns regarding the current requirements and application timeframe for the CALeVIP Fast Charge California Project 1 (FCCP-1). These concerns present substantial challenges for potential program applicants, particularly new entrants into the EV charging infrastructure space, and those with sites dependent on funding for financial viability.

We deeply appreciate the Commission's efforts to accelerate EV charging deployment; however, the program's current structure inadvertently favors incumbent network developers who have been and will continue to build EV charging stations in California regardless of this funding, while creating a significant barrier for businesses aiming to build EV charging stations in California for the first time.

Our primary concerns are the program's requirement for Final Utility Service Design at the application stage coupled with the incompatible existing program timeline and first-come, first-served program structure.

Our concerns are supported by:

- Lead Time for issuing Final Utility Service Designs in California is ~6 months.
- Documented timelines from San Diego Gas & Electric (SDG&E) and Pacific Gas & Electric (PG&E) evidence the ~6 month / 140 business day timeline.
- The timeline for applicants to evaluate FCCP-1 upon release and complete all required inputs to commence utility coordination is around 1.5-2 months.

Our Recommendations:

- Either extend the application window to accommodate realistic utility timelines; and/or
- Accept preliminary utility designs to broaden eligibility and encourage participation from a diverse range of applicants.

Introduction

Electric Era Technologies, Inc. (dba Electric Era) is a Seattle-based company providing intelligent, battery-backed Direct Current Fast Charging (DCFC) systems that are designed to minimize the grid impact of high-power EV charging, accelerate installation timelines, and support high charging reliability.

Electric Era partners with site hosts, ranging from local businesses to larger enterprises, and installs and operates EV Fast Charging stations all across the United States.

Timeline for Obtaining Final Utility Service Designs

The Implementation Manual released January 31, 2025 restricts eligibility for the CALeVIP program to applicants who obtain both the Final Utility Service Design and Issued Permits for each site for which they wish to request funding. The current program timeline does not accommodate the time required to receive Final Utility Service Designs in California and thus immediately disadvantages projects for which the process of working with the utility had not begun prior to Implementation Manual release.

Event	Date	Duration from Implementation Manual Release (January 31, 2025)	Equivalent Business Days
Implementation Manual Released	January 31, 2025	N/A	N/A
FCCP-1 Application Window Opens	July 8, 2025	5 months, 8 days	108
FCCP-1 Application Window Ends	September 30, 2025	7 months, 30 days	167

Table 1: Key Dates and Durations for FCCP-1

Table 1 above outlines the timeline from the release of the Implementation Manual to the start and end dates of the Application Window. While we recognize the substantial efforts made by the California State Assembly, California Public Utilities Commission, and California's Investor-Owned Utilities to streamline both the process and cost structure for deploying EV charging infrastructure,¹ **there is both documented and anecdotal evidence that indicates that the current timeline to reach Final Utility Service Design in California is still around 6 months at a minimum**, which actively disadvantages prospective projects that were not underway before the release of the FCCP-1 Implementation Manual.

San Diego Gas & Electric's (SDG&E) Rule 45 Energization Steps outlines a timeline of 140 business days from initial customer site inquiry to assembly and delivery of the Final Utility Service Design package to customers.² **As noted above in Table 1, there are 108 business days**

¹See California Assembly Bill 841 (2019-2020), CPUC Resolution E-5167, Southern California Edison Rule 29, Pacific Gas and Electric (Rule 29), San Diego Gas and Electric (Rule 29).

²SDG&E Rule 45 Energization Steps. (2025).

between Implementation Manual Release and commencement of the Application window. This timeline is shorter than the minimum 140 business days required to receive Final Utility Service Designs from SGD&E and thus immediately disadvantages projects for which the process of working with the utility had not begun prior to Implementation Manual release.

In addition to the documented SGD&E timeline, Electric Era has experienced protracted timelines for receiving Final Utility Service Designs in California firsthand, with our projects in SGD&E and PG&E service territory. Following all instructions communicated by SGD&E and PG&E respectively, Electric Era's most recent projects took 147 business days and 134 business days to move from initial site inquiry to receiving the Final Utility Service Design. **For both of these electric utilities, the time between the release of the Implementation Manual and the commencement of the Application window is not long enough to receive required materials.** Given this is a first-come, first-served program, this substantially disadvantages projects for which the process of obtaining utility designs is not already underway prior to the release of the Implementation Manual.

In conclusion, the program's requirement for Final Utility Service Designs coupled with its first-come, first-served allocation method creates a significant barrier for new EV charging infrastructure projects. The protracted timelines for obtaining necessary utility documentation effectively impedes submission of projects that were not already in progress before the program's announcement, suggesting that the initial wave of funding will likely support projects that may not have been dependent on this financial assistance. This reality could lead to an inefficient use of public funds as they are dispensed on projects that would've been completed regardless.

Early Project Evaluation and Commercial Feasibility of the Current FCCP-1 Timeline

As outlined in the previous section, the current timeline of FCCP-1 prioritizes funding projects from incumbent network developers who have been and will continue to build EV charging stations in California regardless of this funding, while creating a significant barrier for businesses aiming to build EV charging stations in California for the first time.

The commercial aspects of EV charging site development, including site selection, site feasibility studies, and contract negotiations, are time-consuming. For sites enabled by grant funding, these conversations often cannot commence until grant program details are made public. Each grant funding opportunity comes with its own unique set of requirements, FCCP-1 included. Requirements may include geographic eligibility, charger type, charger and charging station power level, and station configuration, to name a few. **With regard to FCCP-1, prospective applicants were not made aware of the specific site layout and power requirements prior to the release of the Implementation Manual.** These inputs are crucial to assessing the financial viability, predicted utilization, and predicted benefits of a potential project; all of which are required for entities assessing the business case of entering the EV

charging space. Additionally, these inputs are required to develop site designs and communicate accurate load information to electric utilities – these are required to initiate site inquiry and commence the ~6 month timeline to receive Final Utility Service Design, as detailed above, and can take 1.5-2 months to complete.

The timeline, as currently outlined by the CEC for FCCP-1, requires that sites are locked down, contracts are signed, and work has begun on utility coordination before January 31. This implies that sites must be financially viable and buildable even without grant funding, in addition to possessing a strong inherent business case for a four-port, 150kW+ station, such that this demand and the associated site design had already been confirmed, contracted, and communicated to the electric utility. Furthermore, for potential sites in charging deserts or rural areas for which deployment enabled by grant funding, the reality of having to get those sites shovel ready is that work is being done on sites that either wouldn't be built if not awarded or would not be built with as high of a power-level or as many ports. This reality further stresses the business case of preparing for and applying to FCCP-1.

This program structure inherently favors incumbent network developers with pre-existing site agreements and designs, disadvantages new market entrants, and favors those that would build regardless of receiving funding. This reality could lead to an inefficient use of public funds as they are dispensed on projects that would've been completed regardless.

While we understand from the Implementation Manual that there are plans to repeat this program such that prospective applicants will have future opportunities to submit applications for which Final Utility Service Design was not issued before September 30, 2025, we note that information to this effect is non-committal and does not allow prospective applicants to make informed decisions regarding resource allocation and potential costs incurred to prepare applications for FCCP-1. Additionally, we recognize that not all funding opportunities need to be appropriate for all entities. However, CALeVIP specifically is the only EV grant funding opportunity from the California Energy Commission for which the entire state of California is eligible. This is attractive to our retail partners who are often ineligible for other EV Infrastructure grant programs due to geographic restrictions.

As it stands, the program's current design discourages investment by California retailers, who are critical to expanding EV charging infrastructure. We strongly urge the Commission to acknowledge the commercial realities of EV charging site development and adjust program requirements accordingly.

Our Recommendations

To address these concerns and ensure the CALeVIP program effectively supports the expansion of EV charging infrastructure without inadvertently discouraging participation by new market entrants and unfairly elevating the opportunity for incumbent EVSE providers, we propose the following:

We strongly recommend extending the application window by two months, shifting the

opening to September and closing to November. This will allow sufficient time for all proposers to obtain the required documentation, without creating a structural advantage for any specific group of applicants.

Alternatively, or in conjunction with the timeline being pushed back, we propose accepting preliminary utility designs at the application stage. Preliminary utility design estimates, as informed by our experience building in California, provide a broader cost assessment and feasibility analysis for the project. This assessment would provide the CEC with the confidence to assess project readiness, whilst not barring proposals from being eligible due to the protracted timeline for receiving Final Utility Service Designs.

Conclusion

The current structure and timeline of FCCP-1, particularly the requirement for Final Utility Service Designs at the application stage coupled with the first-come, first-served allocation, create significant challenges and structural disadvantages for applicants. The current program structure inadvertently favors established network developers, a reality that could support the allocation of these funds to projects that would likely proceed regardless of grant support. Simultaneously, these requirements create substantial barriers for new entrants to the EV charging space, particularly California retailers like those Electric Era works with, who are critical to expanding EV charging access across California. To ensure a more equitable and effective deployment of EV charging infrastructure, we reiterate our strong recommendations:

1. Either extend the FCCP-1 application window to accommodate realistic utility timelines; and/or
2. Accept preliminary utility designs to broaden eligibility and encourage participation from a diverse range of applicants.

Implementing these adjustments will foster a more competitive landscape and support a more efficient and impactful use of public funds in building out California's vital EV charging network.

We are committed to working with the California Energy Commission to ensure the success of the CALeVIP program and support the state's ambitious EV adoption goals. We believe that by addressing these concerns, the Commission can create a more equitable and effective program that fosters innovation and accelerates the deployment of EV charging infrastructure across California. Thank you for your consideration.

Sincerely,

Electric Era Technologies, Inc. (dba Electric Era)

Kyle Rowe
Director of Government Partnerships
krowe@electriceratechnologies.com