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Anaheim Public Utilities Comments on Proposed Title 20 Changes

Additional submitted attachment is included below.

STATE OF CALIFORNIA
BEFORE THE CALIFORNIA ENERGY COMMISSION

In the Matter of:

Developing Regulations,
Guidelines and Policies for
Implementing SB 350 and the
Warren-Alquist Act

Docket No. 18-OIR-01

Comments of the Anaheim Public Utilities on the
Commissioner Workshop on Title 20 Data
Collection Regulations

November 12, 2020

**Comments of Anaheim Public Utilities on Commissioner Workshop
on Title 20 Data Collection Regulations**

Anaheim Public Utilities (APU) thanks you for the opportunity to provide comments on Title 20 Data Collection Regulations, as discussed at the October 27, 2020 Commissioner Workshop. APU recognizes the importance of data collection of alternative transportation fuels, and offers the following comments to clarify provisions related to Electric Vehicle Supply Equipment (EVSE) reporting requirements under Sections §1382 Definitions, §1385 EVSE Station Data Reporting and Criteria, and §1386 EVSE Session Data Reporting.

Clarification on Reporting Entities

Per the proposed language §1382 (f), “Electric vehicle service provider” (EVSP) means a company responsible for providing drivers with charging sessions or billing via EVSEs on their network. An EVSP can remotely monitor and control an EVSE in the field from either a back-office or cloud services.

The majority of APU’s EVSEs are networked through providers like Blink, ChargePoint and Greenlots. During the Commissioner Workshop, CEC staff clarified that these networked EVSEs are to be

reported by the charging network service providers mentioned above. APU recommends adding language to clarify the regulatory intent, as both APU and the service providers have the ability to provide drivers with charging sessions or billing, and can remotely monitor and control networked EVSEs from a back-office or cloud services.

Specifically, APU recommends updating §1382 (f). An example is provided as below:

§1382 (f) ...An EVSP can remotely monitor and control an EVSE in the field from either a back-office or cloud services. If the EVSE owner does not have its own charging network, but rather manages the EVSE through a charging network service provider, the charging network service provider is considered the EVSP in this case, and is solely responsible for the EVSE reporting requirements pursuant to sections §1385 and §1386.

Clarifications on EVSEs Subject to the Reporting Requirements

The Commissioner Workshop presentation states that the data needs are specific to public networked EVSEs only¹. However, the proposed language does not appear to specify such limitation. APU recommends including language to clarify the regulatory intent.

In addition, it is not clear if public, non-networked EVSEs are subject to the reporting requirements. APU owns two public EVSEs that are stand-alone and non-networked. EV charging is free to parking lot patrons. There is no technical capability to record charging session data, or even aggregated (such as monthly) charging data for these two EVSEs. APU recommends that public, non-networked EVSEs should not be subject to these reporting requirements, as dynamic data is not available. The collection of static station and EVSE data alone cannot be used for driver behavior analysis, modeling or demand forecasting.

Specifically, APU recommends updating the proposed regulation language as below:

§1385 (b) ... For each public and networked station operated by the EVSP, report the following information...

§1385 (c) For each public and networked EVSE, report the following information...

¹ Commissioner Workshop Presentation "Title 20 Data Proposal Electric Vehicle Supply Equipment", Page 5, "Data Needs: Station-, EVSE-, and session-level data from public networked EVSEs", TN235402_20201023T101523

§1385 (d) For each public and networked EVSE port, report the following information...

§1386 (b) This “dynamic” data is related to charging sessions for each public and networked EVSE...

Thank you for your time and consideration. APU welcomes opportunities for continued collaboration with the Commission to ensure data collection is sufficient for demand forecasting and grid planning to meet the State’s decarbonization goals.

Respectfully Submitted,

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