

DOCKETED

Docket Number:	18-OIR-01
Project Title:	Energy Data Collection - Phase 2
TN #:	235685
Document Title:	CalETC's Comments on CEC's Commissioner Workshop on Title 20 Data Collection Regulations
Description:	N/A
Filer:	System
Organization:	CalETC
Submitter Role:	Public
Submission Date:	11/18/2020 3:07:16 PM
Docketed Date:	11/18/2020

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Submitted On: 11/18/2020
Docket Number: 18-OIR-01*

**CaIETC's Comments on CEC's Commissioner Workshop on
Title 20 Data Collection Regulations**

Additional submitted attachment is included below.



November 18, 2020

California Energy Commission (CEC)
Re: Docket No. 18-OIR-01
Sacramento, California 95814-5512

Submitted to the CEC Docket Log for Docket No. 18-OIR-01 and Emailed to CEC Staff

Re: Comments on the CEC’s Commissioner Workshop on Title 20 Data Collection Regulations to Support New Analytical Needs – Phase 2

The California Electric Transportation Coalition (CalETC) appreciates the opportunity to provide feedback on the CEC’s Commissioner Workshop on proposed changes to the Title 20 Data Collection Regulations to Support New Analytical Needs, Phase 2, held on October 27, 2020. We appreciate the time and effort it took to organize these workshops and the new information that was provided.

CalETC supports and advocates for the transition to a zero-emission transportation future to spur economic growth, fuel diversity and energy independence, improve air quality, 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 the Los Angeles Department of Water and Power, Pacific Gas and Electric, Sacramento Municipal Utility District, San Diego Gas and Electric, Southern California Edison, the Southern California Public Power Authority, and the Northern California Power Agency. In addition to electric utilities, our membership also includes major automakers, manufacturers of zero-emission trucks and buses, electric vehicle charging providers, and other industry leaders supporting transportation electrification.

Understanding the plug-in electric vehicle (PEV) market is essential to accelerate adoption.

CalETC agrees with and supports the CEC’s intention to collect charging-station data to inform forecasting, support grid planning, and optimize charging behavior. However, the PEV market is still in the very early stages of development and increased regulation and the associated cost increases to collect such data could negatively affect the adoption of EVs. The main purpose for collecting this data under AB 2127 is to further transportation electrification. At this stage of the PEV market’s development, CalETC believes that understanding the market is most essential to accelerate adoption. Further, this will help make a sustainable business case for charging-station companies, automakers, and others investing in this technology to speed the market development.

Policies and regulations should lower the cost of charging and promote accessible and affordable electricity fuel for all Californians.

Putting requirements on electric vehicle service providers (EVSPs) to provide intensive information will likely result in increased cost and potential market stagnation at a time when California must cultivate the market to get more PEVs on the road and achieve state policy goals. Furthermore, imposing financial penalties on charging station owners and operators for not complying with the reporting requirements could deter many businesses from deploying charging infrastructure in the first place. We encourage the CEC to ensure that the final regulation is tailored to collect data that supports the goals of efficiently expanding transportation electrification, while minimizing reporting costs for EVSPs and ensuring data confidentiality.

Lower cost charging solutions are essential to growing the market for electric vehicles (EVs) and meeting the state’s EV and charging infrastructure goals. CalETC recommends policymakers pursue policies and regulations that lower the cost of charging and promote accessible and affordable electricity fuel for all Californians. We understand and appreciate the necessity for the CEC to use data to support the implementation of the Electric Vehicle Charging Infrastructure Assessment (AB 2127), the transportation forecast for the Integrated Energy Policy Report, and an analysis of charging infrastructure disproportionality (SB 1000). CalETC and its members would like to work with you to ensure that any data the CEC is seeking to collect is legally permissible, technically feasible, and will effectively achieve improved and useful energy analytics.

We appreciate the opportunity to provide the following comments:

- 1. A PEV data workgroup should be convened to determine what data collection already exists, how those efforts can be coordinated for efficiency, and determine what gaps need to be addressed.**

Given that electric vehicle supply equipment (EVSE) data is already being collected in multiple forums, we recommend that the Energy Assessments, Fuels and Transportation, and Renewable Energy divisions at the CEC first convene and lead a PEV data workgroup to bring together data experts to compare and understand the existing data collection efforts and determine what gaps need to be addressed. We recommend the CEC provide funding to support this workgroup to hire experts to compile and analyze existing data and literature sources.¹ The workgroup could use data from, for example: The National

¹ The Vehicle Grid Integration Working Group (VGIWG), formed by the Joint Agencies of California (CPUC, CEC, CARB, and CAISO), received strong support from a broad stakeholder group for Policy 4.06: “Use EPIC, ratepayer, US DOE, and/or utility LCFS funds for an on-going, multi-year program to convene VGI data experts to study lessons learned, quantify VGI/DER net value, fund new data sources, and study other topics.” (*Final Report of the California Joint Agencies VGIWG*, June 30, 2020, p. 38, Table 8, 4.06.; Available at: <https://gridworks.org/wp-content/uploads/2020/07/VGI-Working-Group-Final-Report-6.30.20.pdf>.) Funding and coordinating the review described by Policy 4.06 would greatly aid the CEC’s data collection effort and would inform how to lower the up-front and on-going costs of charging.

Renewable Energy Laboratory Alternative Fuels Data Center database, CEC Alternative and Renewable Fuel and Vehicle Technology Program grant reporting, California Air Resources Board (CARB) and Low Carbon Fuels Standard reporting, California Public Utilities Commission (CPUC) reporting, and data that EVSPs already provide to research institutions. Appropriate data experts to include in such a workgroup would include those from national labs, universities, utilities, research organizations like the Electric Power Research Institute, and other appropriate state agencies like CARB and the CPUC.

Convening this workgroup would allow all of the entities that are collecting data on EVSEs, including the California state agencies, to evaluate what data collection efforts are already taking place, streamline reporting efforts and timelines, establish procedures for how data can be shared between agencies and organizations, and ascertain what data gaps exist. Achieving these goals would prevent EVSPs from having to shoulder the burden of duplicative reporting, which will invariably increase costs of electricity fuel. Increased fuel costs will make EVs less attractive to California drivers, especially drivers from low-income and disadvantaged communities, and make it more difficult to EVSPs to be successful during a time of great economic pressure due to the global pandemic. We believe a PEV workgroup will help ensure electricity fuel costs remain low but still allow the CEC to find the data that it needs to conduct its assessments.

2. We believe that a voluntary program would yield enough data to inform demand forecasting and result in improved energy analytics, on top of the data currently available.

A voluntary approach would allow for those EVSPs that have adequate resources and capabilities to supply data, but would not overly burden EVSE owners and operators that do not have the resources or capabilities to supply the kind of data required in the proposed regulations. Such an approach would yield useful representative data samplings and could be developed through the workgroup described above.

Additionally, CalETC supports the Electric Vehicle Charging Association's and its members' concerns regarding the sensitivity of EV charging data and the risk of sharing proprietary data. The session level data the CEC is requesting informs companies' proprietary infrastructure deployment strategies and advances their respective business models. If after evaluating the publicly available data and identifying data gaps, the CEC determines session level data is necessary, then we recommend the CEC consider how this information can be shared to protect EVSPs' proprietary information and consider allowing EVSPs to report aggregated data. Further, while having a fully complete dataset is always ideal, a substantial dataset can still provide the same magnitude of insights.

- 3. We recommend the CEC adopt a simple definition of which publicly available networked chargers will be subject to this regulation.**

The current draft regulation does not include a definition for what chargers will be subject to the reporting requirements and CEC staff has confirmed that only publicly available networked chargers will be required to report. If the CEC moves forward with these regulations, we recommend adopting a definition that clearly and simply defines these requirements to ensure that reporting can be done efficiently.

We greatly appreciate your consideration of our comments and look forward to our continued collaboration.

Best regards,

Kristian Corby
Deputy Executive Director - CalETC