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SDG&E Comments on Joint Agency EVSE Workshop

Additional submitted attachment is included below.



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California Energy Commission
Docket Unit, MS-4
Docket No. 21-TRAN-03
715 P Street
Sacramento, CA 95814

Re: San Diego Gas & Electric Company's Comments on the Joint Agency Workshop on Accelerating Electric Vehicle Charging Infrastructure Deployment and Grid Integration (Docket Number 21-TRAN-03)

Dear California Energy Commission,

San Diego Gas & Electric Company (SDG&E) appreciates the opportunity to comment on the Joint Agency Public Workshop: *Accelerating Electric Vehicle Charging Infrastructure Deployment and Grid Integration* hosted by the California Energy Commission (CEC), California Public Utilities Commission (CPUC), and Governor's Office of Business and Economic Development (GO-Biz) on October 12, 2021.

SDG&E supports efforts to accelerate electric vehicle (EV) charging infrastructure deployment and grid integration and commends the joint agencies for continuing the conversation on how to meet California's transportation electrification (TE) goals. Reducing emissions from the transportation sector, which remains the largest source of greenhouse gases (GHG) emissions in the state and accounts for about 50 percent of total statewide emissions,¹ is critically important to achieving California's economy-wide carbon neutral target.

As CPUC Commissioner Rechtschaffen noted in his welcome remarks, California's goal to transition to entirely zero-emission light duty vehicle sales in 2035 and medium and heavy-duty vehicle sales by 2045 is demanding but achievable. The current lack of EV charging infrastructure is a critical barrier to meeting these state goals. SDG&E agrees with Commissioner Rechtschaffen and the goals of Senate Bill (SB) 350 that utility investments are needed to meet statewide GHG reduction goals, and such investments should focus on equity to ensure that the benefits of EVs are accessible to all Californians.

¹ CEC "Transforming Transportation" <https://www.energy.ca.gov/about/core-responsibility-fact-sheets/transforming-transportation>.

Investments Should Focus on Equity (Assembly Bill 841 Priority Communities)

SDG&E supports the focus on equity in utility TE programs. Assembly Bill (AB) 841 requires that at least 35 percent of TE investments made by large electrical corporations be made in underserved communities. All of SDG&E's TE programs include minimum equity investment requirements, including a requirement that 50 percent of sites in SDG&E's Power Your Drive Extension Program be in underserved communities.

Additionally, Governor Newsom's Executive Order (EO) N-79-20 which set the goal that all passenger car and truck sales in California be zero emission by 2035, sets the priority for GHG reduction in underserved communities by ordering that the CPUC "shall use existing authorities to accelerate deployment of affordable fueling and charging options for zero-emission vehicles, in ways that serve all communities and in particular low-income and disadvantaged communities".² The EO directs the CPUC to authorize utility programs which support equity and to prioritize utility investments in EV infrastructure located in underserved communities which otherwise may not be able to meet EV and GHG goals through private investment alone.

Utility Driven TE Programs are Needed for California to Meet its TE and Climate Goals

SDG&E is a leader in TE and supports California's efforts to achieve its aggressive emissions reduction goals. To enable the state transition to zero-emission vehicles, SDG&E has been working to expand charging infrastructure in its service territory to support cars, buses, trucks and more through the following programs: Power Your Drive Pilot and Extension (focused on workplaces and multi-unit dwellings),³ Power Your Drive for Fleets,⁴ Power Your Drive for Schools, Parks, and Beaches,⁵ and Priority Review Projects (SB 350 Pilot Projects).^{6,7} Additionally, in October 2021 SDG&E released "Building a Better Future: Sustainability Strategy Update," a sustainability strategy detailing progress on its climate change-conscious goals in environmental stewardship, clean transportation, grid modernization, community engagement, and company operations – further emphasizing its commitment to TE and GHG emissions reduction.

² EO N-79-20 at Order 1.

³ CPUC Decision (D.) 16-01-045 authorizing the Power Your Drive Pilot Program and D.21-04-014 Power Your Drive Extension Program.

⁴ D.19-08-026 authorizing SDG&E's Medium Duty/Heavy Duty EV program as well as its vehicle to grid pilot program.

⁵ D.19-11-017 authorizing the AB 1082 Schools EV pilot and the AB 1083 Parks pilot.

⁶ D.18-01-024 authorizing six Priority Review Projects (Airport Ground Support Equipment, Electrify Local Highways, Port Electrification, Fleet Delivery Services, Green Shuttle, and Dealership Incentives).

⁷ SDG&E's programs are now all referred to under the "Power Your Drive" branding for cohesion between SDG&E EV programs and better communication with SDG&E customers. The program names have been communicated to stakeholders and was announced at SDG&E's Program Advisory Council (PAC) meeting in October 2020.

Utility driven TE programs are necessary if California is to meet its TE and climate goals. CEC Commissioner Monahan noted that per the most recent AB 2127 EV Charging Infrastructure Assessment, only 74,000 chargers are currently installed of the 1.2 million chargers needed for light-duty vehicles to meet California's 2030 goals – a shortfall of over nine hundred thousand chargers.⁸ Public charging opportunities are needed to meet growing demand for EVs, and private investments alone will not be enough to meet these needs.

State and federal budgets provide funding for transportation electrification but will need substantial additional contributions if state targets are to be met. California's latest state budget included historic levels of investment in clean transportation, with more than \$3.5 billion for zero-emission vehicles and of which \$915 million is marked for charging infrastructure.⁹ Additionally, President Biden recently signed the \$1 trillion Infrastructure Investment and Jobs Act which will deliver \$384 million over five years to build out EV charging infrastructure in California (subject to change based on updated factor data each fiscal year) as outlined in the White House Infrastructure Investment and Jobs Act California fact sheet.^{10,11} This state and federal funding is a welcome contribution but is not sufficient on its own. Proportionally based on the population of its service territory compared to the rest of California, SDG&E's service territory can expect to receive less than \$92 million of state funding and \$40 million of the federal budgets – which still leaves a large gap for private and utility investment to fully electrify transportation within the territory.

As described by CEC Deputy Director Hannon Rasool in opening remarks, ultimately utility programs, federal and state investment, and private investments will all be necessary to hit state targets, particularly in underserved communities that may otherwise be missed by private investments alone. Federal and state money do not obviate the need for utility further investment to fill the wide chasm between California's TE ambitions and the funding available to meet them. Utilities should continue investments until there is strong evidence that these programs are no longer necessary to accelerate TE adoption, establish a self-sustaining private EV marketplace, increase access to zero-emission vehicles for underserved communities, reduce California's greenhouse gas emissions, or create high-quality jobs for Californians.

⁸ "Electric Vehicle Charging Infrastructure Assessment - AB 2127"

<https://www.energy.ca.gov/programs-and-topics/programs/electric-vehicle-charging-infrastructure-assessment-ab-2127>.

⁹ "CA Budget Approves Historic Clean Transportation Investments"

<https://www.nrdc.org/experts/miles-muller/ca-budget-approves-historic-clean-transportation-investments>.

¹⁰ "The Infrastructure Investment and Jobs Act will Deliver for California"

<https://www.whitehouse.gov/wp-content/uploads/2021/08/CALIFORNIA-The-Infrastructure-Investment-and-Jobs-Act-State-Fact-Sheet.pdf>.

¹¹ H.R.3684 - 117th Congress (2021-2022): Infrastructure Investment and Jobs Act

<https://www.congress.gov/bill/117th-congress/house-bill/3684>.

SDG&E appreciates the joint agencies and the stakeholders who participated in the workshop for their efforts to advance EV charging infrastructure deployment and grid integration. SDG&E is committed to continuing to support efforts to meet state TE and EV adoption goals.

Sincerely,

/s/ Kirstie C. Raagas

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