

DOCKETED	
Docket Number:	23-IEPR-01
Project Title:	General Scope
TN #:	249354
Document Title:	Electrify America Comments on 2023 IEPR Scope
Description:	N/A
Filer:	System
Organization:	Electrify America/Rhia Davis
Submitter Role:	Public
Submission Date:	3/17/2023 4:57:16 PM
Docketed Date:	3/17/2023

Comment Received From: Rhia Davis
Submitted On: 3/17/2023
Docket Number: 23-IEPR-01

Electrify America Comments on 2023 IEPR Scope

Additional submitted attachment is included below.



March 17, 2023

Commissioner Patty Monahan
California Energy Commission
715 P Street
Sacramento, California 95814

RE: Comments on 23-IEPR-01: 2023 Scoping Order

Dear Commissioner Monahan:

Electrify America appreciates the opportunity to comment on the draft Scoping Order for the 2023 Integrated Energy Policy Report (IEPR). Electrify America is the nation's largest open direct current (DC) fast charging network for electric vehicles, with over 3,500 ultra-fast chargers across more than 800 locations around the country, and over 1,000 chargers across 245 locations open to the public in California.

We appreciate and strongly support the proposed focus on interconnection of clean energy technologies with the electricity grid, including zero-emission vehicle fueling infrastructure and vehicle-grid integration. Utility site energization is a major source of delay and cost in developing DC fast charging stations in California, and we look forward to working on this issue through the 2023 IEPR with the California Energy Commission (CEC) and other stakeholders.

As noted in our 2022 Q3 Quarterly Report to the California Air Resources Board,¹ it costs 48% more, on average, to design and construct an Electrify America station in California than it costs to build a station with the same number of chargers in another state. This higher cost per station results in California receiving fewer stations per dollar invested by Electrify America, and these higher costs are primarily driven by permitting delays and utility site energization delays. As of the end of Q3 2022, the new service utility interconnection process for Electrify America stations averaged 38 weeks, or nearly nine months, in California. Critically, California's utilities have not completed construction, inspection, and energization of the new utility service until, on average, 32 weeks, or approximately seven months, after Electrify America completed construction of its charging stations.

We were pleased to see the California Public Utilities Commission (CPUC) recently adopt an average target timeline of 125 days for investor-owned utilities to interconnect electric vehicle (EV) charging stations, and we hope that through this process and otherwise, the CEC can work with municipal utilities to achieve similar outcomes in their service territories. We recognize that the CPUC action was just one step in an ongoing process, and that utilities face several

¹ <https://media.electrifyamerica.com/assets/documents/original/953-Q32022ElectrifyAmericaReporttoCARBPublicvf.pdf>

demands on their human resources. We look forward to working collaboratively with utilities and others through the IEPR process to highlight potential issues, challenges, and solutions to accelerate energization of EV charging stations in order to meet – and eventually, beat – a 125-day average energization target statewide. We also note that the CPUC action was limited to stations of 2 MW or less, and that larger stations and stations serving electric heavy-duty fleets may exceed that. Additional work will be needed to streamline interconnection and energization of those stations, and we encourage the CEC to tackle that issue as part of this proceeding as well.

Finally, Electrify America continues to encounter process challenges in deploying behind-the-meter, non-export battery energy storage systems (BESS) at ultra-fast charging stations. For example, some utilities consider the storage to be added load or generation, whereas these battery systems are designed to reduce peak load and lower demands on the distribution system. Treating batteries as new load – in addition to the EV charging station load – without factoring in their load shaving capabilities serves as a barrier to rapid deployment efforts and frequently leads to rigorous, time-intensive interconnection studies.²

The CPUC-approved Rule 21 interconnection processes allow utilities to require supplemental reviews that may span months and add tens of thousands of dollars in cost, and California’s utilities are asking for supplemental reviews more frequently. In one such instance, receiving interconnection approval took 11 months from Electrify America’s initial application submittal. The project was required to undergo Rule 21’s Supplemental Review (SR), Electrical Independent Test (EIT), and System Impact Study (SIS) processes due to unrelated pre-existing grid system conditions – a potentially undue burden to assess the BESS acting solely behind the meter. These additional processes are leading to longer timelines and material cost and overhead increases that may result in decreased investment in such systems moving forward, despite the proven grid benefits of such assets.

Through the 2023 IEPR process, we look forward to sharing our experience and to collaboratively working to address barriers to energizing DC fast charging for light-duty and heavy-duty electric vehicles and effectively integrating EV charging with the electricity grid. Thank you for the opportunity to comment on draft scope of the proceeding.

Sincerely,

/s/

Rhiannon Davis
Director of Government Affairs
Electrify America

² For more examples of this concern, see U.S. Department of Energy, 2021. “An EV Future: Navigating the Transition.” Available at: https://www.evplusgridworkshop.com/files/ugd/1c0235_965967cdf2bf4b94924c05637398fda3.pdf