

DOCKETED

Docket Number:	23-IEPR-01
Project Title:	General Scope
TN #:	249489
Document Title:	Michael Coates Comments - Comments regarding HD Electric Vehicle Charging Infrastructure Energization Demand
Description:	N/A
Filer:	System
Organization:	Michael Coates
Submitter Role:	Public
Submission Date:	3/29/2023 11:31:29 AM
Docketed Date:	3/29/2023

*Comment Received From: Michael Coates
Submitted On: 3/29/2023
Docket Number: 23-IEPR-01*

Comments regarding HD Electric Vehicle Charging Infrastructure Energization Demand

Date: March 29, 2023

To: California Energy Commission
Commissioner Patricia Monahan "lead"
Commissioner Siva Gunda "associate"

2023 IEPR Docket "docket@energy.ca.gov"

Subject: Docket Number 23-IEPR-01 "Scoping Order"

In re: Comments regarding HD Electric Vehicle Charging Infrastructure energization demand as addressed in the 2023 IEPR Scoping Order

Dear Commissioners:

WattEV applauds the focus of the 2023 Integrated Energy Policy Report (IEPR) on electric vehicle charging infrastructure, particularly for the commercial sector of medium and heavy-duty trucks. We encourage you to address the critical challenge we are facing which threatens not just to derail the state's progress toward freight sector electrification, but present real risk of missing critical deadlines for reaching zero emission goods movement set by Gov. Newsom and codified in CARB's recently adopted 2022 Scoping Plan.

WattEV lives in this space. We are building a network of solar-powered and grid-connected charging depots and electric truck stops designed to serve California's vital freight movement system, some with the Energy Commission as a project partner. Our first four depots in Southern California will become operational this year "assuming they will receive the requisite utility power. Our typical depots start with 5MW of power requirement with projected growth over time to 25MW.

We also are purchasing and operating an all-electric Class 8 truck fleet for our truck-as-a-service operation, offering small fleets and individuals a path to participate in the electric transformation of the freight sector.

Charging infrastructure and its timely availability is the core of both parts of our business. We hope the 2023 IEPR will be the document that helps break the logjam that continues to impede progress on the development of the needed infrastructure of the medium and heavy-duty electric truck transport fleets.

One of the central goals laid out in the 2023 EIPR "Scoping Order" is to examine barriers and potential solutions to the decarbonization path the state of California has embarked upon. We're working hand-in-glove with the state to reach a net-zero carbon economy on the timelines and milestones established by the Governor's Office and the state Legislature.

We are deeply engaged in one of the most critically significant barriers to navigating that path: the electrification of the state's goods / freight movement charging system. Building the charging network isn't the problem. Getting utility power to it is.

In particular, we'd like to bring to your attention the significant challenge to the success of two key elements of progress along the state's path to electrified freight: the California Air Resources Board's Advanced Clean Truck Rule (ACT) and the proposed Advanced Clean Fleet Rule (ACF).

The CEC's role in the success of the ACT and ACF cannot be overstated. It's up to the CEC to help fund and implement the efficacious and timely rollout of heavy-duty electric truck charging infrastructure in support of the ACT and ACF. There is an urgent need for the provision of power from energy providers to charging infrastructure developers like ourselves in order to meet the timelines established in those rules.

This is an institutional barrier that can be overcome, but only if it is acknowledged and addressed by the state's policymakers. The 2023 IEPR is where the policy change needs to begin with urgency.

If successful, the combination of the ACT and AFC rules will set California on a firm path towards a zero-emission freight system, dramatically improving California's air quality, especially the two air districts encompassed by the Southern California Air Quality Management District and the San Joaquin Valley Air Pollution Control District.

The success of the ACT and AFC regulations is predicated on the widespread availability of charging infrastructure, the "third leg of the stool" in electrifying California's freight sector. The first two legs of the stool "vehicle manufacturers and fleets" are required to electrify beginning in 2025. Conversely, there is no requirement to adopt the third leg, charging infrastructure. Unfortunately, both the ACT and the ACF rules are at significant risk of failure because of this mandate gap, which is clearly identified in the draft IEPR Scoping Order: primarily interconnection delays.

The delays in getting power supplied to our and others' charging infrastructure projects have caused CARB staff to recommend compliance "exemptions" of up to five years in the ACF rule for fleets that cannot get power for electrification of their charging infrastructure. At a recent CARB workshop on those ACF exemptions, one large energy provider testified that five years wouldn't be long enough, given their other energization demands and priorities.

This seeming lack of priority on the part of some energy providers must be addressed if

the state's carbon reduction goals are to be met on the current timelines. As well, we believe it will be impossible for obligated vehicle manufacturers (OEMs) and their obligated fleet customers to meet compliance timelines established in the ACT and ACF without significant state intervention in the energization issue.

The ZE vehicles are being built by OEMs, we and other fleets are ordering the trucks and are ready to put the vehicles into service, but the infrastructure remains a barrier due to an apparent lack of priority or urgency among energy providers. That's understandable, given they're not obligated to meet a compliance timeline, as are OEMs and fleets. This has caused a real-time backup in the issuance of HVIP vouchers to vehicle buyers who've sought extensions due to lack of charging infrastructure.

We urge the CEC in the 2023 IEPR to take up the gauntlet laid down in the Scoping Order to solve the critical problem that chargers will need to be connected to the grid for the state to meet its decarbonization goals. The state needs to move beyond the stage outlined where agencies are working together to active, enforceable requirements to address interconnection delays:

¢ We believe we've reached the point where the state must adopt legislation or an executive order from the Governor's Office requiring the California Public Utilities Commission to adopt a companion regulation to its recently adopted E-5247, which requires energy providers to energize charging infrastructure projects of 2MW or less within 125 days of service request. While this power level may be a good start for passenger vehicles, it's haplessly inadequate for charging electric trucks at publicly accessible depots. None of our projects fall into this category.

¢ We'd suggest the companion regulation require energy providers to supply energization to charging infrastructure projects of 3MW to 8MW within six months of service request or risk penalties as developed by the CPUC after a public process. Moreover, we'd suggest this regulation be expedited for adoption by the end of 2023 so that it takes effect on Jan. 1, 2024. This is critical if OEMs and fleets are to begin complying with the ACT and ACF rules beginning in 2025.

The stated goal of the IEPR is to make recommendations for policy. We heartily recommend that the policy recommendations that come out of this IEPR process be rapidly enacted policies that create timeline compliance alignment between the ACT (affecting OEMs), the ACF (affecting fleets), and the energization of charging infrastructure (affecting energy providers).

Respectfully submitted, very truly yours,

Salim Youssefzadeh
CEO
WattEV

Additional submitted attachment is included below.

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