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Prologis follow-up comments to May 9 Workshop on Clean Energy Interconnection – Electric Distribution Grid

Additional submitted attachment is included below.

May 12, 2023

California Energy Commission (CEC)
715 P Street
Sacramento, California 95814

RE: Docket #: 23-IEPR-05, Project Title: Accelerating Distribution Grid Connection

Thank you for the opportunity to participate in the May 9, 2023 Commissioner Workshop on Clean Energy Interconnection – Electric Distribution Grid. We respectfully submit the following supplemental comments to the oral testimony provided by Henrik Holland, Global Head of Prologis Mobility, regarding Rule 29.

Rule 29 funds service extensions, which means there is a very strong incentive to take 480V service as the step-down transformer cost is covered when owned by the investor-owned utility (IOU). However, this can lead industrial-scale electric vehicle (EV) charging developers down a path that makes future site expandability uncertain. As explained to us by the respective utilities, Pacific Gas and Electric (PG&E) will limit a Rule 29 site to two 480V services, and Southern California Edison (SCE), three.

It is unclear how additional EV charging demand would be served at sites given these limits and expansions could be needed quickly. Rework cost risk and operational impact risk creates future-fitness planning challenges, and inconsistent cap rules create a bias toward one IOU territory over another, the impacts of which could become measurable over time.

Prologis would recommend neutralizing the low voltage vs. medium voltage conflict Rule 29 creates by uncapping the number of 480V services permitted under Rule 29 and make the rule consistent across the IOUs. The number of services permitted under Rule 29 should not be different from one IOU to the other within California.

Thank you, again, for the opportunity to share our perspectives. Please do not hesitate to reach out with any questions.

Respectfully,

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