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May 9, 2023 IEPR Distribution Grid Interconnection Workshop

Additional submitted attachment is included below.

To: California Energy Commission
From: Dan Bowerson, Alliance for Automotive Innovation
Date: May 23, 2023
Re: Comments on May 9, 2023 IEPR Distribution Grid Interconnection Workshop
Docket No. 23-IEPR-05 “Identifying Barriers and Solutions in the Electric Distribution System”

The Alliance for Automotive Innovation (Auto Innovators)¹ appreciates this opportunity to comment on the May 9, 2023 IEPR Distribution Grid Interconnection Workshop. We commend the Energy Commission and its sister agencies for their timely efforts to project and plan for the grid upgrades needed to support achievement of California’s transportation electrification goals. We further appreciate their acknowledgement that meeting this challenge requires significant process reform—by the agencies, utilities and local permitting authorities.

The Advanced Clean Cars II regulation’s requirement to rapidly scale down emissions from light duty vehicles will put millions of electric vehicles on California’s roads as ZEV and PHEVs rise from under 20% of LDV sales today to 100% in 2035. Auto Innovators’ members are fully committed to reaching these goals, and they have invested billions to develop electric vehicles (EVs) and their components. Over the next few years dozens of new models of EVs, at least one from each of our OEM members, will be available to California drivers.

To have the confidence to purchase an EV, drivers need access to convenient, accessible, affordable, and reliable ways to charge or fill their vehicles. It is imperative that deployment of charging infrastructure—and the grid infrastructure to support it—keeps up with the pace at which ACC II requires EV sales to rise. “Business as usual” approaches cannot keep up with current interconnection requests, let alone the accelerating needs consistent with meeting the ACC II goals. *Significant reforms to planning, permitting, and authorizing the necessary grid upgrades are crucial to the success of ACC II.*

Auto Innovators understands that serving the charging needs of light duty EVs is but one of the grid planning challenges that transportation electrification poses for California’s utilities. Unlike MD/HD truck and transit operators, auto OEMs cannot provide advance notice of where and when charging demand will arise on the grid. *High levels of participation in mass market EV tariffs and managed charging programs (enabled by telematics based submetering) that reward drivers for charging when the grid is less congested can help mitigate the impact of charging in residential and some commercial settings, but utilities will still need the ability to monitor and act promptly to increasing congestion on the secondary distribution grid.* Corridor charging is more amenable to planning: we concur with Tesla’s recommendation that *the agencies should create a coordinated multi-stakeholder process to identify areas along travel corridors where fast-charging is needed to support light, medium and heavy-duty fast charging sites.*

¹ From the manufacturers producing most vehicles sold in the U.S. to autonomous vehicle innovators to equipment suppliers, battery producers and semiconductor makers – Alliance for Automotive Innovation represents the full auto industry, a sector supporting 10 million American jobs and five percent of the economy. Active in Washington, D.C. and all 50 states, the association is committed to a cleaner, safer and smarter personal transportation future. www.autosinnovate.org.

The CPUC and POU governing boards should allow utilities to expand T&D capacity ahead of new service requests in these designated areas and corridors subject to detailed analysis and consideration of how distributed energy resources might mitigate the need for upgrades . Given the current scarcity of sites with sufficient spare capacity to serve DCFC plazas, the risk of stranded costs is low: developers will be attracted to these locations. Federal or state funding guarantees (for example via a Green Bank), could further mitigate stranded cost risk for smaller utilities.

Additional steps that California's utilities, regulators and governing boards should take include:

- *Incorporate ACC II and other electrification policies into their planning processes;*
- *Streamline the utility easement process;*
- *Adopt process reforms to speed infrastructure deployment timelines (e.g. parallel vs. sequential processes);*
- *Work with local permitting authorities to streamline permitting processes;*
- *Proactively address permitting for corridors and other areas identified as likely sites for grid upgrades to support DCFC charging;*
- *Ensure that the agencies and the utilities have sufficient, suitably trained staff to perform all necessary activities from planning to energization (including workforce develop initiatives to provide a pipeline of qualified candidates) ;*
- *Extend beneficial line-extension treatment (Rules 29 and 45);*
- *Maintain up-to-date public hosting capacity maps.*

Thank you for the opportunity to add our perspective to the record in this proceeding. Auto Innovators looks forward to a constructive collaboration with the agencies, utilities and other stakeholders to overcome these and other challenges as we work together to realize California's vision for a zero emission transportation future.