

DOCKETED

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**CalETC's Comments on IEPR Commissioner Workshop on the
Distribution Grid**

Additional submitted attachment is included below.



May 31, 2023

California Energy Commission
Re: Docket No. 23-IEPR-05

Submitted via electronic commenting system for docket 23-IEPR-05

Re: Commissioner Workshop on the Clean Energy Interconnection –Distribution Grid

The California Electric Transportation Coalition (CalETC) appreciates the opportunity to provide comments on the Commissioner Workshop on the Clean Energy Interconnection for the Electricity Distribution Grid (Workshop) for the Integrated Energy Policy Report (IEPR), held on May 9th. This letter is intended to support the direction the Commissioners and Staff outlined in the IEPR workshop and provide feedback for consideration by Lead Commissioner Monahan and CEC staff.

CalETC supports and advocates for the transition to a zero-emission transportation future to spur economic growth, fuel diversity and energy independence, contribute to clean air, and combat climate change. CalETC is a non-profit association committed to the successful introduction and large-scale deployment of all forms of electric transportation. Our Board of Directors includes representatives from: Los Angeles Department of Water and Power, Pacific Gas and Electric, Sacramento Municipal Utility District, San Diego Gas and Electric, Southern California Edison, Southern California Public Power Authority, and the Northern California Power Agency. In addition to electric utilities, our membership includes major automakers, manufacturers of zero-emission trucks and buses, electric vehicle charging providers, autonomous electric vehicle fleet operators, and other industry leaders supporting transportation electrification.

California has goals to transition to 100% sales of light-duty zero-emission vehicles (ZEVs) and drayage trucks by 2035 and 100% on-road ZEV fleet by 2045.¹ The Advanced Clean Trucks and Advanced Clean Fleets rules will significantly increase the number of energization requests from fleets. These rules will take effect in a few short months on January 1, 2024. California's ambitious goals and regulations require that our grid planning processes account for the build out of grid infrastructure, so California is ready to meet its EV goals. For this reason, we strongly support the use of the high transportation electrification scenario as the baseline for the IEPR forecast.

CalETC supports an increased emphasis on workforce development in careers for electricians and engineers that support the safety and reliability of the electric grid. Further, we recommend including a focus on diversity, equity, and inclusion. We recommend working with the state higher education organizations to increase the number of graduates in these areas and encourage regulators to expedite approval for the use of Low Carbon Fuel Standard (LCFS) electricity credit proceeds spending for EV-related workforce development training programs in disadvantaged communities. There will likely need to be an increase in funding for schools to grow these

¹ Governor Newsom Executive Order N-79-20.

programs and support scholarships for students, especially from equity communities. We recommend actively recruiting in priority equity communities and in schools that serve those communities.

We also want to emphasize that customers, fleets, and charging station providers should engage with their local electric utilities in the project planning process as early as possible. It is essential for utility customers to begin the planning process early and work closely with the utility to ensure the energization process proceeds as efficiently as possible. Open and frequent communication between the utility and the customer/project proponent is an essential part of the energization process.

There is tremendous focus on streamlining the energization process, including reducing utility timelines. CalETC recognizes that finding ways to streamline and improve the effectiveness of the utility-customer application process will help shorten response times and improve the use of limited utility resources. The California Public Utilities Commission (CPUC) has implemented the EV Infrastructure Rule to provide a streamlined process for make-ready infrastructure to support electrification, including data reporting to improve transparency and identify ways to further improve the process for load interconnection. However, as highlighted in the workshop, significant delays are often due to incomplete customer designs and applications, multiple false applications filed by contractors, and ongoing design and project scope changes. There may be an opportunity for utilities to screen customer applications before a formal service application is submitted, so that utility engineers are not bogged down conducting capacity analyses for sites that will not ultimately be built. Pre-application support could reduce attrition and improve the percentage of applications that become completed projects.

While utility efforts to improve overall grid readiness and energization timelines progress, customer education is also critical. Customers need to better understand the inputs to a successful application. The CEC could help by providing education via quarterly webinars reviewing the difference between rules and programs, walking the customer through the application process. There are vendors that provide contracting services to customers to help determine site feasibility and options, and they would also benefit from this education and provide valuable input, reducing the burden on ratepayer resources. CalETC would be happy to discuss this concept with staff in greater detail. Thank you for your consideration of our comments. Please do not hesitate to contact me kristian@caletc.com should you have any questions.

Sincerely,



Kristian Corby, Deputy Executive Director
California Electric Transportation Coalition