

**DOCKETED**

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

*Additional submitted attachment is included below.*



May 31, 2023

California Energy Commission  
Re: Docket No. 23-IEPR-04

*Submitted via electronic commenting system for docket 23-IEPR-04*

### **Re: Commissioner Workshop on the Clean Energy Interconnection – Bulk Grid**

The California Electric Transportation Coalition (CalETC) appreciates the opportunity to provide comments on the Commissioner Workshop on the Clean Energy Interconnection for the Bulk Grid (Workshop) for the Integrated Energy Policy Report (IEPR) held on May 4<sup>th</sup>. 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.<sup>1</sup> These ambitious goals require that grid planning processes account for the build out of grid infrastructure, so California will be ready to meet these goals. For this reason, we strongly support the use of the high transportation electrification scenario as the baseline for the IEPR forecast.

To this end, CalETC supports planning and deployment of the transmission resources in transportation corridors necessary to serve large light-, medium-, and heavy-duty vehicle charging stations. A recent study from the International Council on Clean Transportation found that the average public truck charging station in 2025 will be 900 kW and in 2030 it will be 10 MW.<sup>2</sup> An earlier study by the West Coast Clean Transit Corridor Initiative projected even higher loads for

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<sup>1</sup> Governor Newsom Executive Order N-79-20.

<sup>2</sup> Pierre-Louis Ragon et al., *Near-Term Infrastructure Deployment to Support Zero-Emission Medium- And Heavy-Duty Vehicles In The United States* (Available at: <https://theicct.org/publication/infrastructure-deployment-mhgv-may23/>).

large truck charging plazas, noting that a single plaza could require upwards of 23.5MW.<sup>3</sup> Given the scale of the power demand required for these large charging plazas, planning an adequate transmission system including transmission lines and other supporting network upgrades to serve transportation corridors will be necessary to the development of these important charging/refueling plazas. Planning a reliable and adequate transmission grid system will ensure the utilities' ability to meet high load requirements, improve interconnection timelines, and reduce future distribution infrastructure costs while maintaining the safe and reliable operation of the transmission grid.

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 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.

Thank you for your consideration of our comments. Please do not hesitate to contact me [kristian@caletc.com](mailto:kristian@caletc.com) should you have any questions.

Sincerely,

A handwritten signature in blue ink, appearing to read 'K. Corby', with a long horizontal flourish extending to the right.

Kristian Corby, Deputy Executive Director  
California Electric Transportation Coalition

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<sup>3</sup> West Coast Clean Transit Corridor Initiative Final Report, June 2020. (Full Report available at: <https://westcoastcleantransit.com/#resources-section>).