

DOCKETED	
Docket Number:	25-IEPR-06
Project Title:	Accelerating Interconnection and Energization
TN #:	265775
Document Title:	Powering America's Commercial Transportation Comment - 2025 IEPR Workshop
Description:	N/A
Filer:	System
Organization:	Powering America's Commercial Transportation
Submitter Role:	Public
Submission Date:	8/25/2025 4:25:54 PM
Docketed Date:	8/25/2025

*Comment Received From: Powering America's Commercial Transportation
Submitted On: 8/25/2025
Docket Number: 25-IEPR-06*

PACT Comments on 25-IEPR-06 Workshop

Please find attached PACT's Comments on the 25-IEPR-06 workshop.

Additional submitted attachment is included below.



August 25, 2025

California Energy Commission
Docket Office
Docket No. 25-IEPR-6
715 P Street
Sacramento, CA 95814

Dear Chair Hochschild and Honorable Commissioners:

Powering America's Commercial Transportation ("PACT") appreciates the opportunity to submit these comments in response to the workshop held in connection to Docket No. 25-IEPR-6 "Accelerating Interconnection and Energization." PACT commends the California Energy Commission ("CEC") for establishing this track to address the interconnection and energization challenges that California faces. This issue is timely and urgent to address, both to meet generation interconnection and distribution energization needs simultaneously and concurrently.

There have been several accomplishments on interconnection issues that merit application to energization issues. In particular, PACT supports taking the "hotspots" or "areas of focus" approach to interconnection and applying it to distribution planning and energization challenges. For example, the "First Ready-to-Go, First Served" concept for interconnection projects applies to energization as well. The methodology used for determining which interconnection projects will have the highest impact to the broadest range of projects should also be applied to energization projects. Particularly for projects that will emerge in geographic clusters, this will allow for fewer infrastructure capacity addition projects and keep electricity prices affordable.

PACT also supports the various initiatives utilities are taking in regard to process improvements. Utilities are increasingly doing more work in parallel as opposed to sequentially. PACT recommends that all California utilities adopt LADWP's cluster approach. This approach should be considered a "best practice" and should also be applied to distribution projects needing energization. PACT also supports PG&E's proposal to provide project proponents more information on capacity connection earlier in the process, which is a much-needed step in the right direction.

PACT is concerned that the demarcation between interconnection - only for generation - and energization - only for distribution - is not as black-and-white as the presenters described during the workshop. For example, the California Public Utilities Commission ("CPUC") recently approved PG&E's Rule 30, allowing for retail energization of large loads connecting directly to transmission lines above 50kV and below 230kV. The CEC, CPUC, and other energy planning authorities should account for larger retail loads connecting directly to the typically lower-voltage portions transmission grid.

PACT appreciates Matt Coldwell's comprehensive briefing on the CPUC's efforts regarding energization. PACT agrees with his observation that there is an opportunity to bring topics discussed in various



proceedings together in a more holistic manner. Further, PACT agrees with Mr. Coldwell's observations that grid capacity, flexible service connections, on-site solar, on-site battery storage needs, and the myriad of related technology options, need to be treated holistically as they are all being incorporated into M/HD charging projects. Today, these topics are addressed in different dockets and in different rate schedules at each utility.

PACT also agrees with the remarks by Mr. Jigar Shah of Electrify America. Mr. Shah commented on the need for additional synergies between Rules 15, 29/34, and 21 to reduce upgrade timelines, cost, and complexity. Current utility processes assume EV charger installations are designed first, followed by considerations for on-site solar and energy storage in a sequential manner. However, this is not reflective of how charging service providers are operating in practice - they are treating all these options concurrently, and utility work processes must be amended to reflect a similar cadence. Mr. Shah further indicated that his company was routinely experiencing 285-300 calendar day timelines for site energization. This is a far cry from the 125-day timeline that the CPUC called for in the Final Decision in the Energization Proceeding, issued last year. PACT members are experiencing similar delays and protracted timelines. Finally, PACT concurs with Mr. Shah's comments regarding inconsistencies between the IOUs and how they treat similar projects, and how each utility interprets and makes decisions on individual Rules in their tariffs. PACT encourages consistency across all California utilities - both IOU and POU - on a range of topics, including design review processes, standardized distribution grid assets specifications, timing, and Rules interpretation.

PACT applauds the CPUC and the CEC for working together on several common topics to further transportation electrification in California. These efforts, however, are not moving fast enough to meet the commercial transportation industry's needs. While there is a lot of activity, it is not resulting in material improvements in performance and outcomes. Proceedings take a long time to reach decisions. After a final decision is reached, there is still time needed for implementation and advice letters meaning that tangible outcomes won't materialize until 2027 and later. The commercial transportation industry needs improvements now. M/HD projects need to move from design to energization in 24 months - the first 12 months for design, planning and permitting, and the second 12 months for construction and energization. Critically, PACT members need to have confirmation from the utility on grid capacity availability, including flexible service connection availability, within the first three months of project processes.

PACT appreciates the CEC's attention to this issue and is grateful for the opportunity to submit these comments. PACT looks forward to continued engagement with the CEC to support the needs of the M/HD vehicle industry in California.

Sincerely,

/s/ David Bonelli
David Bonelli, Partner, Venable LLP
Counsel to PACT