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May 27, 2022

**ADVICE LETTER 4011-E**

San Diego Gas & Electric Company (U 902-E)

**ADVICE LETTER AL 444-E**

Bear Valley Electric Service INC (U 913-E)

**ADVICE LETTER 192-E**

Liberty Utilities (CalPeco Electric) LLC (U 933-E)

**ADVICE LETTER 6607-E**

Pacific Gas & Electric Company (U 39-E)

**ADVICE LETTER AL 685-E**

PacifiCorp (U 901-E)

**ADVICE LETTER 4803-E**

Southern California Edison Company (U 338-E)

**PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA**

**SUBJECT: Joint Utility Advice Letter in Compliance with Ordering Paragraph 8 of Resolution E-5167 and Ordering Paragraph 8 of Resolution E-5168**

**PURPOSE**

San Diego Gas & Electric Company (SDG&E), Bear Valley Electric Service Inc. (Bear Valley), Liberty Utilities (Liberty), Pacific Gas and Electric Company (PG&E), PacifiCorp, and Southern California Edison Company (SCE) – together, the Investor-Owned Utilities (IOUs) – submit this Tier 2 advice letter (AL) to the California Public Utilities Commission (Commission or CPUC) to propose a service energization timeline, in compliance with Ordering Paragraph (OP) 8 of Resolution E-5167 and OP 8 of Resolution E-5168 (collectively, the Resolutions).

**BACKGROUND**

On February 26, 2021, the large IOUs submitted PG&E AL 6102-E, SDG&E AL 3705-E, and SCE AL 4429-E pursuant to Assembly Bill (AB) 841, which provided authority to establish new Electric Vehicle (EV) Infrastructure Rules. The small IOUs proposed similar EV Infrastructure Rules pursuant to AB 841 through Bear Valley AL 413-E and Liberty AL 166-E filed March 1, 2021, and PacifiCorp AL 649-E filed May 21, 2021.

On October 7, 2021, the Commission issued Resolution E-5167 and Resolution E-5168 that approved, with modifications, the IOU EV Infrastructure Rule proposals. The EV Infrastructure Rules were adopted and opened to customers under Electric Rule 24 by Liberty, Electric Rule 29 by PG&E and SCE, and Electric Rule 45 by SDG&E on April 7, 2022. PacifiCorp's EV Infrastructure Rule will be offered under Rule 24 and is expected to be implemented by July 2022. Collectively these Rules are referred to as the EV Infrastructure Rules.

Ordering Paragraph 8 of Resolution E-5167 and OP 8 of Resolution E-5168 ordered the IOUs to host a workshop within 180 days to discuss barriers to the timely energization of EV charging infrastructure and the perspectives of EV service providers (EVSPs) and other industry representatives. The IOUs hosted this public workshop on March 28, 2022.

Representatives from EVSPs, technology vendors, automakers, cities and counties, consumer and environmental justice organizations, state agencies, and the California Governor's Office of Business and Economic Development (GO-Biz) attended the workshop. The IOUs provided an overview of the EV Infrastructure Rules and panels that included representatives from the utilities, EVSPs, and other stakeholders, discussed key barriers to timely energization within the utilities' control, barriers outside of utilities' control, and opportunities to improve collaboration, and solutions to address barriers.<sup>1</sup> Workshop attendees also participated in a question-and-answer session.

Within 60 days of the day of the public workshop, OP 8 of Resolution E-5167 and OP 8 of Resolution E-5168 require the IOUs to file a joint Tier 2 AL to propose an average service energization timeline for EV Infrastructure Rule sites.<sup>2</sup> The timeline, at minimum, must address the items included in the second column of the table below. Column 3 of the table below identifies the pages in this filing where the IOUs detail their proposals.

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<sup>1</sup> Representatives from the following organizations agreed to participate in one or more of the three panels, during the public workshop: Amply Power, ChargePoint, EVgo, GO-Biz, Liberty, PacifiCorp, PG&E, SCE, SDG&E, Tesla, and Volvo.

<sup>2</sup> This Tier 2 AL is filed on behalf of all six IOUs and complies with both OP 8 E-5167 and OP 8 E-5168.

#	CPUC Requires that IOUs Address	Page(s)
1	Proposes a numerical target ( <i>i.e.</i> , number of business days) for average energization timing between when a customer submits an application and when their site is energized that reflects efforts to accelerate the current average service energization timeline (the proposed target should be between an average of 90 and 160 days)	3
2	Identifies the processes that are within the IOUs' direct and indirect control	5
3	Identifies the processes that are not within the IOUs' control (e.g., within the control of the customer, authority having jurisdiction, EV service provider, etc.)	6
4	Proposes a process for how the IOU can improve the service energization timing for items that are within their direct and indirect control	7
5	Includes a description of how the IOU can contribute towards improving the timing for other responsibilities, if any	9
6	Ensures the proposal is reflective of the discussions and feedback from the workshop, including the feedback of industry representatives.	9

The IOUs hereby submit this Tier 2 AL in compliance with OP 8 of the Resolutions.

## **DISCUSSION**

The IOUs propose the following average project timeline and actions to improve project timelines associated with the EV Infrastructure Rules.

### **1. The IOUs propose an average numerical target of 160 business days (BD)**

The IOUs propose that sites constructed under the EV Infrastructure Rules meet an average target of 160 BD. This proposed average timeline:

- Includes steps in the EV Infrastructure Rules energization lifecycle that are in IOUs' direct control, including civil construction work
- Excludes steps outside of IOUs' direct control, distribution system work including work conducted under Rule 15, and substation upgrades

The proposed timeline is an average, and the actual time required to energize a given site will depend on the unique conditions of that site and the complexity of the project. Considering this, some sites will be energized faster than the proposed average timeline and some sites will require a longer timeline. This timeline is specific to the EV Infrastructure Rules and does not account for timing for distribution line extensions (*i.e.*, Rule 15) or capacity upgrades.

The IOUs will continually evaluate how to improve the EV Infrastructure Rule service process and expect that 18 months after the EV Infrastructure Rules are introduced that the IOUs will be able to offer lower average targets.

An average timeline of 160 BD is reasonable for the following reasons:

1. The addition of civil construction work for EV projects will likely increase the average energization timeline.

2. The utilities will need time to implement processes proposed to help expedite the energization timeline
3. The current EV market does not produce a predictable volume of “construction-ready” work to justify a more aggressive timeline

***a. Addition of civil construction work***

During the public workshop, the IOUs identified that their current average timelines for the installation of EV charging infrastructure under existing service extension rules generally ranged from 150 to 155 BD, on average, for the steps within the IOUs’ direct control. However, this timeline did not reflect the additional time that the utilities will need to support the additional civil construction work required by the EV Infrastructure Rules.

Rule 16 identifies civil construction (*e.g.*, excavation, conduit, and substructures) as customers’ responsibility. In contrast, the EV Infrastructure Rules include “civil construction” work in the definition of “electric distribution infrastructure” work for which the utility is responsible. The EV Infrastructure Rules’ tariffs require that each IOU design and deploy all electrical distribution infrastructure on the utility side of the customer meter for all customers installing separately metered infrastructure to support charging stations. For the purposes of the tariff, “electrical distribution infrastructure” includes, among other things, civil construction work.<sup>3</sup>

This is a significant change in responsibility between the utility and customers applying for new service. Civil construction can be complex work that varies with each jurisdiction. Consequently, IOUs must account for the addition of civil construction work, the potential complexity of managing civil construction in different jurisdictions, and the additional time that it may add to the energization timeline. Incorporating this civil construction work into the utilities’ current timelines would increase their baseline totals by an average of 25-35 BD or from 150 to 155 BD to 175 to 180 BD.

***b. Time required to implement process improvements***

The IOUs are currently working to implement the processes to manage EV Infrastructure Rule jobs. For example, some IOUs are planning to devote dedicated internal or third-party resources EV Infrastructure Rule projects. Ramping up these teams will require time, as will fully developing EV Infrastructure Rule processes and procedures. The time required to develop these teams may initially raise the average timeline for EV Infrastructure Rule projects. A 160 business day average target will allow the IOUs the time required to develop these processes while still complying with a consistent average target for EV Infrastructure Rule work.

***c. The EV market does not produce predictable “construction-ready” work***

The IOUs can only begin construction on an EV Infrastructure Rule job when it is “construction-ready.” The IOUs define “construction-ready” work as projects that have:

- Executed contracts

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<sup>3</sup> AB 841 Section 3, codified at PU Code Section 740.19(b).

- All necessary land rights
- All necessary permits
- All necessary utility procedures are planned to ensure electric system safety, worker safety, and public safety

The proposed energization timeline does not include steps that customers and Authorities Having Jurisdiction (AHJs) are responsible for (e.g., AHJ issuing permits, customers providing signed easements), but completion of these tasks ultimately determine whether projects are considered “construction-ready.” Today, it is common for many applications to sit in the construction phase for several months before it is “construction-ready” because of an outstanding dependency such as waiting for an AHJ to issue a permit. The EV market is still in a nascent state and key non-utility market participants (e.g., AHJ, customers, etc.) are optimizing processes to support the energization life cycle.

The IOUs are committed to improving execution of their steps in the energization lifecycle. However, other stakeholders – particularly permit agencies – are responsible for critical path activities necessary for energization. In other words, the IOUs can expedite their steps of the timeline, but projects will be energized when all stakeholders have completed their respective tasks. In PG&E’s service territory, approximately 24% of the projects built in 2021 took over a year to be “construction ready” after the contract was executed and approximately 25% took between six months to a year. These delays are often, but not always, a result of factors outside of the utility control (e.g., delays in permit issuance, easement language negotiations). While the utilities expect this to improve as the market matures, the current time it takes for a project to be “construction ready” drives significant variability in the number of jobs dedicated crews can build on a month-to-month basis.

A moderate timeline provides predictability for customers in the near term, and time for the EV market to mature and produce the volume of “construction-ready” work needed to support a more aggressive timeline.

## **2. The average numerical target should only apply to steps within the IOU’s direct control for EV Infrastructure Rules work.**

The average numerical target should only apply to steps in the EV Infrastructure Rules energization lifecycle for which the IOUs are solely responsible. This would ensure that the utility timeline is transparent, predictable, and trackable. Customers, AHJ, and EVSPs are not governed by the Commission, and thus do not have the same regulatory expectation or oversight to ensure an enforceable timeline is met. Consequently, including steps that are completed by non-utility stakeholders would extend the average timeline overall. The steps in the energization timeline that are under the utilities’ responsibility and should be a part of the target are in the table below.

#	Energization Steps	Included in Target?
1	Customer submits site inquiry	No
2	IOU performs preassessment/engineering study	No
3	Customer reviews site feasibility study and submits all required information	No
4	IOU executes preliminary design	Yes
5	Customer approves or declines preliminary design	No
6	IOU finalizes design and delivers contract to customers	Yes
7	IOU creates and submits easement documents and AHJ permit requests	Yes
8	Customer and IOU completes Pre-Construction Field Meeting	No
9	Customer delivers easement signatures and signed contracts to IOUs, and AHJs issue requested permits	No
10	Customer completes all onsite work and applicable inspections	No
11	IOU schedules and completes civil construction work	Yes
12	IOU schedules and completes electric construction work	Yes

The IOUs acknowledge that performing the pre-assessment/engineering study is a utility task. However, the IOUs propose that this step is excluded from the average targeted timeline. Pre-assessments are generally performed before customers have submitted all required information necessary to produce a design, a best practice developed jointly with EVSPs that is beneficial to the overall timeline to energization. Customers are still responsible for providing additional information for the IOUs to complete the Preliminary Design of the project. Given that customer information is still required before IOUs can begin the actual design of the project, IOUs propose to begin the timeline with step four of the energization lifecycle.

Larger (>2 megawatts) EV projects and projects on constrained electrical systems may trigger upstream capacity upgrades (e.g., distribution line extensions and/or substation upgrades). For most IOUs, Electric Rule 15 covers distribution line upgrades, and substation upgrades are identified and funded as a part of IOUs' respective General Rate Cases (GRCs). Distribution and substation upgrade projects are long-lead time items and may delay interconnection of EV projects. The IOUs are working to ensure the electric grid is ready to accommodate the anticipated increase in transportation electrification over the next few years. However, the EV Infrastructure Rules only apply to work associated with the service extension that extends from the utilities' distribution line facilities to the service delivery point and is not applicable to distribution line extensions, thus the time to complete any required distribution work is excluded from the proposed average timeline of 160 BD.

**3. The average numerical timeline should not apply to steps that are not directly within the IOUs' control.**

The average numerical timeline should not include steps in the energization lifecycle that are not directly in the IOUs' control. Steps that are not in the IOUs' control are any activities that require action by the customer, EVSP, or AHJ. Incorporating estimates of customer, EVSP, or

AHJ activity into the average numerical target will introduce unpredictable variables. AHJ timing to issue permits can vary widely depending on the jurisdiction a project is in. For example, in PG&E's experience a land permitting agency can take between two and six months to issue permits. Setting an average numerical timeline inclusive of non-utility activity like permit acquisition may be difficult to manage, and ultimately misleading for customers. For these reasons, the IOUs urge the Commission to exclude steps outside of utilities' control from the timeline.

The following steps of the energization lifecycle are customers' or AHJs' responsibility and thus not in the utilities' direct control:

- Submitting site inquiries
- Reviewing site feasibility study and submitting all required information
- Approving or declining IOUs' preliminary design
- Requesting Pre-Construction Field Meetings
- Delivering easement signatures and signed contracts to IOUs, and issuing requested permits
- Executing written contracts
- Completing all onsite applicable inspections

#### **4. The IOUs are committed to making ongoing improvements to the energization timeline for customers**

During and after the public workshop, the utilities received feedback on how to improve processes within their control. Recommendations included actions, such as:

- Establishing a single point of contact for EV infrastructure requests;<sup>4</sup>
- Developing a process or tool to help improve transparency and communication<sup>5</sup>
- Improving capacity maps to include available load serving capacity<sup>6</sup>
- Revisiting the easement requirements to help streamline the process<sup>7</sup>
- Developing clearly defined requirements/obligations for customers<sup>8</sup>
- Establishing standards for engineering reviews<sup>9</sup>

As highlighted below, the IOUs are actively working to improve new service timelines for EV customers, and in many cases either have, are in process, or are exploring opportunities to address the feedback provided by stakeholders to help expedite the process. The IOUs may be able to adopt similar or consistent processes to address certain requirements; however, this

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<sup>4</sup> Amly informal comments, p. 3; Electrify America informal comments, pp. 2-3; Joint comments from Tesla, EVgo, and ChargePoint, p. 4.

<sup>5</sup> Comment from public workshop on March 28

<sup>6</sup> Joint comments from Tesla, EVgo, and ChargePoint, p. 7.

<sup>7</sup> Joint comments from Tesla, EVgo, and ChargePoint, p. 5.

<sup>8</sup> Amly informal comments, p. 3.

<sup>9</sup> Amly informal comments, p. 3.

will not always be the case. Specifically, each utility will need to consider its individual business needs, requirements, and risks, and make the decision most appropriate for its customers.

The IOUs are taking the steps to improve timelines,<sup>10</sup> including but not limited to (examples provided are not exhaustive, some IOUs may be conducting activities not mentioned below):

- *Assigning dedicated utility design and project management resources to EV projects.* This allows utility staff to specialize in EV projects and build ongoing working relationships with major EV charging customers. The utilities plan to continue increasing the number of design staff assigned to EV Infrastructure Rules work as the number of customers requesting service under the Rules increases. For example, SCE has a dedicated design and project management team (its Transportation Electrification Project Management (TEPM) team), which includes project managers and inspectors who focus on EV charging infrastructure. Additionally, SCE is hiring resources to help support some of its EV Infrastructure Rule activities. PG&E has also resourced a dedicated team for improved facilitation of utility design, project management and construction responsibilities to deliver a more consistent and predictable customer experience.
- *Improving public communication of IOU timeline and requirements.* For example, PG&E has published its EV Journey Map to outline the key steps in the process to ensure clear understanding of responsibilities and utility target timelines, where applicable to utility-owned responsibilities. Additionally, SCE is developing a factsheet and welcome packages for customers, in order to help increase awareness around responsibilities, requirements, and timelines.
- *Actively working to increase the accessibility of and information provided by the Interconnection Capacity Analysis maps.* For example, SDG&E currently shares its capacity mapping data to help inform customers on the optimal grid locations for at scale charging infrastructure.
- *Considering opportunities to expedite the easement process.* For example, SCE is updating its processes to provide customers with a sample easement document earlier in the project lifecycle. Additionally, SCE plans to allow customers to prepare/provide certain components of the easement materials (i.e., legal description and exhibits) to help expedite the process. PG&E provides pre-approved easement language to customers to avoid any potential delays in securing land rights.
- *Conducting regular meetings with major EVSP customers.* Some IOUs host recurring meetings with many of these customers on a biweekly or monthly basis. These regular meetings improve communication and inform customers about new service processes, helping customers plan their applications and avoiding miscommunications. For example, SDG&E's Design and Project Management team hosts biweekly or monthly

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<sup>10</sup> Not all steps have been taken by all utilities.

meetings with large EVSPs with ongoing projects in the San Diego region. PG&E holds similar meetings with key vendors to discuss current and future jobs.

- *Establishing standards for when the IOU engineering review of the distribution system impacts are required.* For example, SCE already has a system in place that will allow for certain projects (less than 500 kilowatts) to bypass an engineering review, in locations where there are not capacity constraint concerns. However, in areas where there is a risk of a capacity constraint, an engineering review would always be required.

It is important to note that there are some processes that are under utility control but that cannot reasonably be conducted faster. While construction is within utility control and included in the proposed numerical target, material shortages due to the ongoing global supply chain disruption is outside of utility control and may impact average timelines. Additionally, utility construction timelines are unlikely to be reduced without compromising safety or due to local regulations. For example, Liberty is unable to conduct excavations during the winter months due to environmental regulations, which may delay projects.

#### **5. The IOUs can contribute to improving timing processes outside of their control**

During the workshop, the utilities and stakeholders also discussed processes and barriers that are outside of the utilities direct and indirect control. The IOUs can contribute to improving the timing of processes outside of their control by:

- *Requesting forecasts of future charger deployment from the large EV charging network and EV fleet customers.* Soliciting these forecasts helps the utilities plan future infrastructure deployments and have the necessary internal resources in place to timely serve new EV Infrastructure Rule applications when they are submitted.
- *Educating local governments and other AJHs about the expected future growth of EV charging deployments and required permitting.* Some IOUs are actively contributing to efforts by GO-Biz to speed local permitting, which was repeatedly noted in the March 28<sup>th</sup> workshop as a key barrier to timely construction of EV charging sites.
- *Assigning consistent premise addresses.* This is a significant challenge for EV charging projects, and addressing requirements differ by jurisdiction. The utilities may work to encourage standard addressing templates.
- *Strengthening internal supply management practices to secure required equipment and materials.* This is especially pressing during current disruptions to global supply chains. Working with customers to better understand their needs early in the process can help mitigate some challenges with delivery of materials.

#### **6. The IOUs find some of the feedback collected from stakeholders during and after the energization public workshop infeasible.**

The IOUs solicited EVSP and stakeholder feedback during the March 28 public workshop. In addition, on April 18, the Commission provided parties the opportunity to submit informal

comments for the IOUs to consider in preparing their advice letter submission, in the Commission's email Notice of Post-Workshop Comments to Inform IOUs' Joint EV Service Energization Timing Advice Letter. Five parties submitted informal comments: Amply Power Inc.; Electrify America; and, jointly, EVgo Services LLC., Tesla, and ChargePoint Inc.

As discussed above, this proposal reflects feedback from the March 28 public workshop and the informal comments. In addition to the feedback referenced above, at the workshop, stakeholders agreed that regular communication between utilities and customers is vital to avoiding miscommunication and redesigns and speeding project timelines. Further, stakeholders also agreed that permitting requirements are outside of utilities' control but can be a significant barrier to completing projects. EV charging networks offered the importance of sharing their planned projects with utilities early, which is very beneficial for internal utility resource planning.

While the IOUs either have or are in process of taking steps to address numerous stakeholder recommendations, there are some recommendations that the IOUs are unable to address for various reasons. For example, some stakeholders recommended that the IOUs should adopt specific timeframes for certain tasks, without providing any documentation or support to validate how the timeframe was achieved or that it would not have impacts on California's regulatory requirements. Specifically, a concern was raised during the workshop that the IOUs' construction and scheduling process was lengthy, and recommendations were made to reduce this timeframe. However, the utilities discussed that this process often includes time needed to notify impacted customers of potential outages. The IOUs must retain a focus on safety and compliance with California regulatory requirements as they work to expedite their processes.

### **EFFECTIVE DATE**

This filing is subject to Energy Division disposition and should be classified as Tier 2 pursuant to OP 8 of Resolution E-5167 and OP 8 of Resolution E-5168. The IOUs respectfully request this Advice Letter become effective on June 27, 2022, which is 31 days after the date of submittal.

### **PROTEST**

Anyone may protest this Advice Letter to the California Public Utilities Commission. The protest must state the grounds upon which it is based, including such items as financial and service impact, and should be submitted expeditiously. The protest must be submitted electronically and must be received by June 16, 2022, which is 20 days from the date filed. There is no restriction on who may file a protest. The protest should also be sent via e-mail to the attention of the Energy Division Tariff Unit ([EDTariffUnit@cpuc.ca.gov](mailto:EDTariffUnit@cpuc.ca.gov)). A copy of the protest should also be sent via e-mail to the address shown below on the same date it is mailed or delivered to the Commission.

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**NOTICE**

A copy of this filing has been served on the IOUs and interested parties shown on the attached list and Service Lists for R.18-12-006, by either providing them a copy electronically or by mailing them a copy hereof, properly stamped and addressed. Address changes should be directed to SDG&E Tariffs by e-mail at [SDGETariffs@sdge.com](mailto:SDGETariffs@sdge.com).

Respectfully,

/s/ Clay Faber

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CLAY FABER  
Director – Regulatory Affairs



# ADVICE LETTER SUMMARY

## ENERGY UTILITY



MUST BE COMPLETED BY UTILITY (Attach additional pages as needed)

Company name/CPUC Utility No.:

Utility type:

ELC       GAS       WATER  
 PLC       HEAT

Contact Person:

Phone #:  
E-mail:  
E-mail Disposition Notice to:

EXPLANATION OF UTILITY TYPE

ELC = Electric      GAS = Gas      WATER = Water  
PLC = Pipeline      HEAT = Heat

(Date Submitted / Received Stamp by CPUC)

Advice Letter (AL) #:

Tier Designation:

Subject of AL:

Keywords (choose from CPUC listing):

AL Type:  Monthly     Quarterly     Annual     One-Time     Other:

If AL submitted in compliance with a Commission order, indicate relevant Decision/Resolution #:

Does AL replace a withdrawn or rejected AL? If so, identify the prior AL:

Summarize differences between the AL and the prior withdrawn or rejected AL:

Confidential treatment requested?  Yes     No

If yes, specification of confidential information:

Confidential information will be made available to appropriate parties who execute a nondisclosure agreement. Name and contact information to request nondisclosure agreement/ access to confidential information:

Resolution required?  Yes     No

Requested effective date:

No. of tariff sheets:

Estimated system annual revenue effect (%):

Estimated system average rate effect (%):

When rates are affected by AL, include attachment in AL showing average rate effects on customer classes (residential, small commercial, large C/I, agricultural, lighting).

Tariff schedules affected:

Service affected and changes proposed<sup>1</sup>:

Pending advice letters that revise the same tariff sheets:

<sup>1</sup>Discuss in AL if more space is needed.

**Protests and all other correspondence regarding this AL are due no later than 20 days after the date of this submittal, unless otherwise authorized by the Commission, and shall be sent to:**

CPUC, Energy Division  
Attention: Tariff Unit  
505 Van Ness Avenue  
San Francisco, CA 94102  
Email: [EDTariffUnit@cpuc.ca.gov](mailto:EDTariffUnit@cpuc.ca.gov)

Name:  
Title:  
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General Order No. 96-B  
ADVICE LETTER SUBMITTAL MAILING LIST

cc: (w/enclosures)

Public Utilities Commission  
CA. Public Advocates (CalPA)

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Energy Division

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D. Griffiths

Buchalter

K. Cameron  
M. Alcantar

CA Dept. of General Services

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California Energy Markets

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Service List

R.18-12-006