# Near-Term Priority Advice Letter Template

**Purpose**: Each Electrical Corporation choosing to propose a near-term priority program pursuant to the Decision (D.21-07-028) Setting Near-Term Priorities for Transportation Electrification Investments must use this advice letter (AL) template.

1. **Subject:** [Electrical Corporation Company Name, UXXXE] Proposal for Transportation Electrification Near-Term Priority Program(s) under the DRIVE OIR (R.18-12-006) – [name of proposed program(s)]
2. **Purpose:** Summarize the proposed program(s) as follows:
   1. Describe the program, goals and expected outcomes
   2. Program budget (up to $20 million per program, with a total $80 million budget per Electrical Corporation)
      1. How much of the proposed program budget will be allocated for 1) infrastructure deployment[[1]](#footnote-2), 2) marketing, education, and outreach (ME&O), and 3) other expenditures.
   3. Duration of program (not to exceed three years, from program launch), including milestones such as launch date and start-up time, if known.
   4. Identify the near-term priority area(s) the proposal(s) address
      1. Transportation Electrification (TE) and resiliency
      2. Customers without access to home charging
      3. Medium-duty, and heavy-duty
      4. New construction
      5. Low-income residential level 2 panel upgrade
   5. Describe the proposed strategy to address the barriers to TE in the targeted near-term priority area(s) (include narrative description) and the metrics to measure the proposed program’s success (i.e. number of ports installed, number of vehicles electrified, etc.)
   6. Describe the partnerships with third-parties to reduce costs to ratepayers, support the effectiveness of the program, and/or support the TE market.
   7. Describe the potential strategies and opportunities to scale up the program and how this would potentially lead to a reduction in dependence of ratepayer funding over time.
   8. Describe how much of the installed behind-the-meter infrastructure, including EV Supply Equipment (EVSE) and make-ready infrastructure, the Electrical Corporation proposes to own.[[2]](#footnote-3)
   9. Describe the data collection and reporting efforts.
   10. Describe the proposed ME&O efforts.
3. **Ratepayer Protections:** Summarize how the proposed program incorporates measures to limit financial impacts and risks to ratepayers.
   1. Describe how the proposal will leverage ratepayer and non-ratepayer funding to accelerate transportation electrification at a lower cost to ratepayers.
      1. What is the estimated per site funding[[3]](#footnote-4) (percentage of site costs or dollar amount) that the Electrical Corporation’s ratepayers will pay?
      2. What is the estimated per site funding (percentage of site costs or dollar amount) for which the site-host will pay?
      3. If applicable, what is the estimated per site funding (percentage of site costs or dollar amount) for which a third-party will pay?
      4. Describe, and provide workpapers as applicable, how the Electrical Corporation determined that the per port costs are reasonable for this program and market segment. Compare the proposed per port costs to past experience and to the average per port cost thresholds the CPUC has adopted in recent TE decisions.[[4]](#footnote-5)
   2. Describe how specific lessons learned from previous TE programs were incorporated into the proposal? At minimum, describe how the Electrical Corporation used prior program evaluation results, data and lessons learned to assess the appropriate proposed budget, per-port cost estimate, ownership design, and outreach plan.
      1. In addition, how did the Electrical Corporation incorporate input from stakeholders with expertise in the target sector within the program design?
   3. Describe the provision(s) that the Electrical Corporation will propose to be within a customer agreement(s) and the agreement(s) with qualified participating vendors, including Electric Vehicle Service Providers (EVSP), that will ensure the Electrical Corporation and any contracted program evaluator will have access to data needed for program evaluation, such as EVSE usage data, ongoing EVSE maintenance and networking fee cost data, etc.
4. **Equity and Environmental Justice:** Summarize how the proposal incorporates equity and environmental justice measures into the design and implementation of the proposed program.
   1. Describe how the proposed near-term priority program complies with the Equity and Environmental Justice requirements adopted in D.21-07-028.
      1. Identify the percentage of the proposed program infrastructure or expenditures that will be allocated for customers living in underserved communities (minimum 50 percent).
         1. Which underserved community criteria(s), based on the definition included in Assembly Bill 841 (Ting, 2020), will the proposed program prioritize?
         2. If applicable, discuss how the proposed program will ensure incentives reach customers located across a broad geographic distribution.
      2. Discuss how Community-Based Organizations (CBO) contributed to the development of the proposed program.
         1. How many CBOs, and which ones, were consulted during the development of the proposed program?
         2. What input did the CBO(s) provide and how was it incorporated into the proposed program?
         3. What, if any, CBO input was not accepted into the proposed program, and why was it not included?
      3. Describe the support the proposed program has from local, regional, and/or tribal governments within the Electrical Corporation’s service territory.
         1. Which specific local/regional/tribal governments offered their support for the proposal?
         2. What, if any, concerns were raised by local/regional/tribal governments, and how does the proposal address these concerns?
         3. Discuss ways in which the Electrical Corporation will continue to consult with the local/regional/tribal governments throughout program implementation to ensure the local governments are continually heard?
      4. Discuss the measures that will ensure that EV charging infrastructure deployed in underserved communities is accessible (i.e., available, safe) and tailored to the needs of the community’s residents (e.g., considers locations that are specifically well suited to the residents, makes accommodations for accessibility tailored to the location, reaches out to the community in a way that understands the community dynamics, etc.).
         1. What measures did CBO(s) recommend?
         2. How will the proposed measures increase awareness of available EV charging infrastructure for community members who may lack access to home EV charging facilities?
         3. How do the proposed measures address each of the following:
            1. Local language considerations
            2. Americans with Disabilities Act (ADA) accessibility
            3. EVSE visibility
            4. Public education on EV compatibility
            5. Cultural considerations of local history
            6. EV driver and community safety
         4. Attach the plan(s) to describe how the Electrical Corporation will work with site-hosts to increase accessibility at any publicly accessible EV charging location, for sites located in an underserved community and non-underserved communities. (e.g., measures to install lights, measures to protect EV charging infrastructure and customer from snow and ice, etc.) Please be sure to discusses how the Electrical Corporation is working with CBOs to develop this plan(s).
      5. Discuss how the proposed program will ensure marketing, education, and outreach (ME&O) efforts are designed and will be implemented to promote more equitable outreach and program participation.
         1. How was the ME&O plan informed through outreach with CBO(s) and local/regional/tribal governments?
         2. What is the actual ($) and percentage of total ME&O budget that is dedicated to CBOs to execute outreach to community residents?
         3. How will the Electrical Corporation determine the qualifications of the CBO(s) prior to selecting them to implement a portion of the ME&O efforts?
         4. What measures will be used to ensure the CBO(s) is accomplishing their intended goals?
         5. How will the Electrical Corporation and CBO(s) agree to a division of labor for the ME&O efforts?
      6. Describe how the proposal will address the barriers to equity identified in the Commission’s Environmental and Social Justice (ESJ) Action Plan, Tribal Consultation Policy, and Part B of California Air Resource Board’s (CARB) Low-Income Barriers Study.
         1. Please list each barrier to equity that the program will address in the proposal and how the proposal seeks to overcome this barrier(s).
      7. Describe how the proposed program will further the principles of economic equity and promote access to high quality jobs for residents of underserved communities[[5]](#footnote-6) through at least one of the following measures.
         1. What job quality measures, such as wage and benefit standards and responsible contractor standards are included in the proposal?
         2. What job access measures, such as targeted hire requirements as well as specified targets for residents of underserved communities, are included in the proposal?
         3. What comprehensive project agreements addressing both job quality and job access, such as application of the Skilled & Trained Workforce[[6]](#footnote-7) requirement and use of Community Workforce Agreements for large-scale TE projects, are included in the proposal?
         4. What amount of proposed funding would be directed to training partnerships that are guided ensure that investments are connected to and result in the placement in high-quality jobs?
5. **Equipment Eligibility Requirements:**
   1. Describe the process that will be used to qualify equipment in the program?
      1. Does the proposal request to pre-qualify equipment that was approved for a similar program previously authorized by the CPUC?
   2. List the proposed minimum equipment technical requirements for EV charging equipment to meet to qualify for the program.
      1. Do these proposed technical requirements align with the CPUC’s efforts to support open standards, and ensure ratepayer funded infrastructure is capable of high-level communications, as defined in the final report from the 2017 VGI Working Group?
      2. How do these qualifications align with the EVSE qualification requirements adopted in the CPUC’s recent decisions[[7]](#footnote-8) and the EV charging technical needs identified in Chapter 5 of the California Energy Commission’s (CEC) Assembly Bill (AB) 2127 Electric Vehicle Charging Infrastructure Assessment[[8]](#footnote-9)?
6. **Safety**:
   1. Describe the safety requirements that are included in the proposed program.
      1. Do the safety requirements align with the Safety Requirements Checklist adopted in D.18-01-024, D.18-05-040, and D.18-09-034?
      2. Does the proposed program contain safety requirements that exceed those adopted in the Safety Requirements Checklists? If so, list them and provide details on their purpose.
      3. How does the proposal comply with the Electric Vehicle Infrastructure Training Program requirements adopted in Assembly Bill (AB) 841 and codified in Public Utilities Code Section 740.20?
7. **Near-Term Priority Program Proposal:** Include clear, detailed answers to the relevant near-term priority area that the proposed program seeks to target.
   1. Transportation Electrification Resiliency
      1. Discuss how the proposed program will address the following topics:
         1. The expected EV charging loads, EV charging infrastructure assets, EV charging facilities, and EV driver populations that the proposed program will serve.
         2. The types, locations, and probabilities of the hazard(s) that place the intended beneficiaries at risk and the proposed mechanisms the TE resiliency project intends to use to mitigate this risk(s).
         3. The expected quantitative impact of the proposed project on the identified risk(s) (i.e., the number of EV drivers served, the # of ports supported, etc.).
         4. The expected impacts of the proposed project on equity and on ratepayer affordability (e.g., diverse geographic distribution of EV charging infrastructure, affordability of EV charging options, etc.).
         5. If the program intends to install battery storage backup for off-grid EV charging, identify the source of power that will be used to charge the batteries, e.g., from renewable energy resources or low-emitting sources.
      2. Identify which of the semi-annual resiliency planning meetings described in Ordering Paragraph 7 of D.20-06-017 the Electrical Corporation presented their proposal plans to. If the proposal plan was not discussed at a meeting, discuss plans to present at a future meeting, or why this presentation did not occur.
   2. Customers Without Access to Home Charging
      1. Describe how the proposals fills a gap not currently addressed by an existing program.
      2. Discuss how the proposal includes innovative pilot approach(s) to EV charging infrastructure deployment.
      3. Does the proposal include a non-infrastructure approach to address the costs of fueling disparity faced between customers with access to home charging and those without access to home charging? If so, explain the approach(s).
   3. Medium- Duty/Heavy-Duty (MD/HD)
      1. Identify the specific state regulation(s) the proposal is responding to (e.g. California Air Resource Board’s Advance Clean Fleets and Innovative Clean Transit regulations).
      2. Describe why previously approved MD/HD sector programs are insufficient to meet the needs this program proposal seeks to address, and why there are gaps in Electrical Corporation’s existing MD/HD electrification program offerings.
      3. Identify the challenges and barriers within the existing MD/HD programs, and describe how the proposal addresses these barriers.
   4. New Construction
      1. Does the proposal exclusively support infrastructure that exceeds existing state EV infrastructure code requirements? If so, by how much does the proposal seek to exceed existing state EV infrastructure code requirements?
         1. If applicable, how does the proposal support achieving Authority Having Jurisdiction (AHJ) EV infrastructure code requirements?
      2. Describe how the Electrical Corporation consulted with AHJs to determine how much participating builders should exceed the state codes to be eligible for rebates through the proposal.
      3. Describe what gaps the proposal seeks to address that are not currently addressed through another state or local program, code, or agency.
      4. Describe the mechanism for how the Electrical Corporation will report to the Commission’s Energy Division on any state or local code updates that impact new construction.
         1. What procedural pathway will be pursued to modify or halt the program if necessary?
      5. Describe how the proposed program complies with the rebate structure requirements of D.21-07-028.
   5. Low-Income Residential Level 2 Panel Upgrade
      1. Describe what gap(s) in existing TE programs (i.e. ratepayer, taxpayer, or privately funded) the proposal seeks to address, and how the proposed program fills a gap not currently addressed by existing public funding.
      2. Describe how the Electrical Corporation will coordinate with CBOs and other stakeholders to target low-income residential customers.

1. As discussed in D.21-07-028, Section 3.1, any proposal for near-term priority investments filed pursuant to the decision should only be for customer-side infrastructure. Utility-side infrastructure will be installed through the utilities’ Electric Rules 15/16 or EV Infrastructure Rule. [↑](#footnote-ref-2)
2. As stated on page 37 of D.21-07-024, “to qualify for the advice letter process, utility proposals must limit utility ownership of the EVSE and behind-the-meter infrastructure only to sites in underserved communities. They must limit utility ownership of the EVSE and behind-the-meter infrastructure to no more than 50 percent per each proposal.” [↑](#footnote-ref-3)
3. Customer-side of the meter costs only [↑](#footnote-ref-4)
4. D.20-08-045 and D.21-04-017 [↑](#footnote-ref-5)
5. See California Workforce Development Board’s *High Road Training Program*. <https://cwdb.ca.gov/wp-content/uploads/sites/43/2019/09/High-Road-ECJ-Brief_UPDATED-BRANDING.pdf> [↑](#footnote-ref-6)
6. See https://www.dir.ca.gov/Public-Works/ADA-Compliant-STW-FAQ.pdf. [↑](#footnote-ref-7)
7. See D.20-08-045 and D.21-04-014 [↑](#footnote-ref-8)
8. See the CEC’s inaugural [AB 2127 Electric Vehicle Charging Assessment](https://efiling.energy.ca.gov/getdocument.aspx?tn=238853) [↑](#footnote-ref-9)