BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking Regarding Transportation Electrification Policy and Infrastructure.	Rulemaking 23-12-008 *(Filed December 14, 2023)*

REPLY COMMENTS OF THE ALLIANCE FOR TRANSPORTATION ELECTRIFCATION ON PROPOSED DECISION ADOPTING REVISED DATA GATHERING AND REPORTING REQUIREMENTS FOR TRANSPORTATION ELECTRIFICATION PROGRAMS AND PROVIDING CLARIFICATION ON PROGRAMS ADOPTED IN DECISION 22-11-040

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November 24, 2025

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Pursuant to Rule 14.3 of the of the California Public Utilities Commission ("Commission") Rules of Practice and Procedure, the Alliance for Transportation Electrification ("ATE") respectfully submits these Reply Comments on the Proposed Decision Adopting Revised Data Gathering and Reporting Requirements for Transportation Electrification Programs and Providing Clarification on Programs Adopted in Decision 22-11-040 ("Proposed Decision") issued on October 27, 2025.

I. ABOUT ATE

ATE is a 501(c)(6) non-profit corporation established in early 2018 with the goal of promoting policies and regulatory measures to accelerate the pace of EV

adoption and infrastructure. We take a "big tent" approach to advance the industry and focus on accelerating EV charging deployments—which necessarily requires a strong utility role—and promoting public accessibility and open standards. Our members include electric utilities, vehicle manufacturers, fleet charging-as-a-service companies, EV supply equipment ("EVSE") manufacturers, software vendors, and other interested parties. We are presently involved in about 30 proceedings in the States before Public Utilities Commissions, Legislatures, Governors, and state agencies such as Energy Offices, Departments of Transportation and Departments of Environmental Quality.

II. REPLY COMMENTS

The Commission should remove the requirement for a centralized program administrator of the Technical Assistance program, and should allow the individual IOUs to implement the program until the budget is exhausted.

The Proposed Decision rightly identifies the $36 million Technical Assistance ("TA") program as holding value for utility customers even while the Funding Cycle 1 ("FC1") program is paused and the Funding Cycle 0 ("FC0") programs run their course. However, the Commission should accept several recommendations from these utilities on how best to implement the program, including:

- *PG&E's, SCE's and SDG&E's recommendation that the Commission remove the requirement for a centralized program administrator.*

PG&E, SCE and SDG&E already offer this type of service through their Transportation Electrification Advisory Services programs, meaning they have established personnel, processes and expertise in program delivery. Meanwhile, variations to their service connection processes, offerings and rates mean that such

assistance is best delivered in a localized way. Indeed, D. 22-11-040 found that "[i]t is appropriate for the IOUs to maintain administration of TA—for all IOU customers, including FC0, FC1, and non-program participants, as well as bundled and unbundled customers—because TA is part of their core responsibilities, and they are best positioned to administer the current scope of the program."[1] Requiring the TA program to be centrally administered—even if by an IOU, rather than a third-party administrator—fails to capture the full value of the IOUs' positioning, to appropriately leverage their expertise, and to build on their core responsibilities. Given the breadth of customers who may take advantage of TA, and the complexities of rapidly evolving offerings from the IOUs, TA will be best administered by the individual IOUs, as a service to their own customers.

- *PG&E's recommendation that the TA program be allowed to operate until the budget is exhausted.*

Untethering the TA program from the FC1 program means that TA enrollment may not unfold at the pace originally contemplated in D. 22-11-040. This is particularly the case given the broader national and market contexts under which the IOUs will launch TA, with program and tax incentives quite reduced from the levels anticipated in 2022. Notwithstanding these trends, TA remains valuable for customers—and due to these trends, TA is perhaps even more important than ever. For this reason, we urge the Commission to permit the utilities to continue the TA program until budget is exhausted—even if this does not occur in the original 3-year timeframe.

III. CONCLUSION

ATE thanks the Commission for the opportunity to provide these Reply

[1] Decision (D.) 22-11-040 at p. 203-204, Finding of Fact (FOF) 57.

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Comments and looks forward to working with the Commission and stakeholders to determine an appropriately strong role for utilities in supporting the acceleration of transportation electrification.

Dated: November 24, 2025

Respectfully submitted,

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