



NM PRC
May 12, 2022, Workshop to Inform Forthcoming Transportation Electrification Rulemaking

Meeting Objectives

- Understand current NMPRC adjudicated plan on transportation electrification, transportation electrification statute, and IOU implementation of approved plans
- Gain insight into NM state agency goals and activities to advance transportation electrification
- Identify issues that must be addressed by anticipated transportation electrification Notice of Proposed Rulemaking (NOPR)
- Receive guidance from parties for consideration by the Commission in developing the NOPR

In Attendance

- 49 individuals
- 17 distinct participating organizations represented

Reference Material

- Meeting agenda, recording and presentations are available [here](#)
- <https://gridworks.org/initiatives/prcs-2022-grid-modernization-webinar-series-2/>

Welcome

Joseph Maestas (NM PRC Chair) and Sarah Cottrell Probst (NM Energy, Minerals and Natural Resources Department) offered welcomes and described current statewide efforts to advance transportation electrification. Chair Maestas announced a June 9 Transportation Electrification Summit that is being planned. Many participants introduced themselves and shared visions of their favorite electric transportation vehicle.

NM Statute and Summary of IOU Plans

John Reynolds (NM PRC) summarized the Transportation Electrification Plans (TEPs) of the three NM-based IOUs which serve approximately 74% of New Mexico's residential customers. All three plans assume significant growth in electric vehicles in the next 2-8 years. He highlighted the similarities and differences in the TEPs and mentioned the importance of the needs of low-to-moderate income customers. He shared a map of the state's highways noting the many miles that fall outside of the IOU's service territories which are served by electric cooperatives and municipal utilities.



Current IOU and Cooperatives Activities

PNM, SPS, and EPE representatives shared highlights and implementation updates of their approved TEPs. In addition, each utility offered thoughts about the rulemaking regarding transportation electrification. Input included clarification of TE legislation, flexibility versus standardization, etc. See the presentations for additional details.

New Mexico Rural Electric Cooperative Association's Executive Director provided comments regarding electric vehicle charging experiences and strategies of four member coops.

NM Department of Transportation Activities

Jerry Valdez provided information about new guidance being issued by the newly established federal Joint Office of Energy and Transportation outlining requirements for and opportunities associated with transportation electrification. Electric vehicle charging infrastructure improvements was a topic of great interest to many workshop attendees. Individuals interested in being involved in upcoming activities on this topic who are not already on the docket parties list are encouraged to contact Mary Jane Parks at maryjane.parks@state.nm.us.

Issues and Recommended Approaches

Workshop attendees developed lists of issues the anticipated rulemaking should address. Attendees then voted on the highest priority issues and offered recommendations regarding how the Commission might address each issue. Issues receiving the most votes along with recommendations for addressing these "highest priority" issues are shown below.

Filing requirements and cost recovery. (Statute is sufficient to cover the rest)

- a. Clarification of process
- b. Metrics
- c. Timing (how the Commission handles a filing)
- d. Timing (how often/when plans are filed)
- e. How plans can be updated

Recommendations:

- Look at Energy Efficiency and Renewable Portfolio Standard rules for guidance
- Maybe particular time frames on when plans are filed and how they are reviewed
- Clear, standardized application requirements and procedure to provide certainty

Access for low and middle income (LMI) customers

- a. How LMI customers are impacted by cost
- b. Specifying % of budgets for LMI programs
- c. Incentivizing EV adoption



Recommendations:

- Incentivizing EV adoption may need to be taken up by the legislature or IOUs outside this rulemaking; need to clarify if incentives for adoption costs are eligible for cost recovery
- Specify a % of budget for LMI (50% would be appropriate)
- Clarify the Commission's interpretation of statute
- Barriers like cost, trust and verification that have hindered EE programs should be considered and addressed
- Partnerships to educate low and middle-income customers
- public charging provides access; demand charges on businesses may inhibit businesses from adopting chargers
- Availability of charging in public places as an alternative to multi-family charging

How to provide flexibility through the rules

- a. Flexibility for the filings
- b. Flexibility of different types of use cases
- c. Flexibility for financing (e.g., types of incentives, on-bill financing)

Recommendation:

- Avoid constraints (e.g., budget cap) that would inhibit the transition

Software to manage charging

Recommendation:

- Avoid being overly prescriptive; software is dynamic

Integration with DER and Grid Modernization

Recommendations were not developed due to lack of time.

Additional issues identified by the attendees are listed here:

- Cost recovery
- Customer education
- Ongoing O&M
- Budgets of TEPs
- Roles of utilities and rates they charge their customers
- Air quality impacts in disadvantaged customers
- Access to charging in multi-unit dwellings
 - Availability of charging in public places as an alternative to multi-family charging
- Value of rule not totally clear to some participants
- Ensuring electricity as fuel is not inhibited
- Outreach in multiple languages
- Communication standards for future proofing assets
- Federal standards for charging specs



GRIDWORKS

- Interoperability of charging specs beyond federal requirements (relate to access)
- Federal tax incentives
- GIS mapping and methods to inform gaps, accounting for federal requirements and energy sources
 - Statewide design for best locations for charging stations to meet our TE needs
- Leveraging federal funding opportunities for EV programs, as well as renewable energy and broadband access
- Incentivizing EV acquisition
- Reliability metrics for utility-owned & controlled charging stations.
- Utility incentives to construct & operate charging stations in locations that are not targeted by 3rd-party
- Rules for synergy with Clean Fuel Standard

Wrap up

In summary, the IOUs recommend that any new rule regarding Transportation Electrification provide more clarity on procedural issues such as: guidelines and timelines for cost recovery applications, timing on TEP updates, and metrics. In addition, the IOUs request flexibility regarding transportation electrification programs that fit each utility's customers' needs, given the dynamic nature of the electric vehicle marketplace.

A summary of this workshop will be shared with all attendees and is available at the website listed above. In addition, attendees are encouraged to attend the June 9 Transportation Electrification Summit.