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Application of Southern California Edison Company (U 338-E) for Approval of its 2017 Transportation Electrification Proposals	Application 17-01-021 (Filed January 20, 2017)

RESPONSE OF CENTER FOR SUSTAINABLE ENERGY® TO THE APPLICATION OF SOUTHERN CALIFORNIA EDISON COMPANY (U 338-E) FOR APPROVAL OF ITS 2017 TRANSPORTATION ELECTRIFICATION PROPOSALS

Center for Sustainable Energy®

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Paul D. Hernandez
Transportation Electrification Policy Manager
Center for Sustainable Energy®
426 17th Street, Suite 700
Oakland, CA 94612
Tel: (858) 244-1190
paul.hernandez@energycenter.org

Sachu Constantine
Director of Policy
Center for Sustainable Energy®
9325 Sky Park Court, Suite 100
San Diego, CA 92123
Tel: (858) 244-1177
sachu.constantine@energycenter.org

I. INTRODUCTION

The Center for Sustainable Energy® (CSE) is pleased to provide this Response to the California Public Utilities Commission (Commission) regarding the *Application of Southern California Edison Company (U 338-E) for Approval of its 2017 Transportation Electrification Proposals*, filed with the Commission on January 20, 2017 (Application). As a mission-driven nonprofit organization, CSE is committed to accelerating the transition to a sustainable world powered by clean energy, including the diversification of transportation technologies focused on air quality improvements and greenhouse gas (GHG) emissions reductions.

CSE works with policymakers, public agencies, local governments, utilities, business and civic leaders to transform the energy marketplace and accelerate the transition to a clean energy future. Our clean energy future depends on a strong, low carbon economy that provides abundant jobs and business opportunities, a high quality of life, and a clean, healthy environment. This includes the accelerated adoption of Zero-Emission Vehicles (ZEVs) and transportation electrification (TE) technologies, renewable energy (RE), distributed generation (DG), energy efficiency (EE) and building performance (BP) technologies—all of which can work together to contribute to air quality improvements and GHG emissions reductions to meet our long term goals. CSE provides the following response:

RESPONSE TO ALL PROGRAMS:

- ***Education and Outreach (E&O) programs with statewide touchpoints will require statewide coordination.***
- ***Further guidance regarding anonymous and aggregated data is warranted.***
- ***Evaluate the use of a single, neutral, third party program ombudsman to facilitate TE activities.***
- ***Prioritize TE investments that complement statewide transportation and infrastructure policy initiatives.***

RESPONSE TO SCE'S TE APPLICATION:

- ***Support for SCE's Priority Review Projects***
- ***Support for SCE's Standard Review Projects***
- ***Leverage SCE's existing Program Advisory Council (PAC).***
- ***Quarterly, not annual, reporting will be warranted.***
- ***All proposed EVSE programs should have Vehicle-Grid Integration (VGI) functionality.***
- ***Set 25% disadvantaged communities (DAC) benchmarks, and tailor goals to reflect SCE's territory demographics.***

RESPONSE TO ALL PROGRAMS

II. EDUCATION AND OUTREACH (E&O) PROGRAMS WITH STATEWIDE TOUCHPOINTS WILL REQUIRE STATEWIDE COORDINATION.

CSE appreciates that two of the Applications (i.e., PG&E and SDG&E) contain E&O program elements, as consumer-focused engagement is a critical tool to accelerate clean technology adoption. CSE attests that establishing E&O, such as TE advisory services, is appropriate as the utility is uniquely positioned to manage and implement these types of fleet programs for their customer base.[1] However, to minimize duplicative efforts, encourage resource sharing, promote economies of scale, reduce redundancies, and ensure message uniformity and alignment with statewide transportation policy objectives, the Commission should direct coordination between certain, already-existing E&O programs, including:

- **ZEV Consumer E&O.** The Applications should coordinate with and support existing consumer education efforts, such as the Clean Vehicle Rebate Project (CVRP) E&O and the Plug-In Electric Vehicle Collaborative's BestRideEver campaign, rather than create additional E&O under separate branding. CSE provided this same request in

[1] *Response of the Center for Sustainable Energy to the Application of Southern California Edison Company (U 338-E) for Approval of its Charge Ready and Market Education Programs;* December 5, 2014, pages 5-6.

reviewing the original EV Applications, in support of SCE's[2] and PG&E's[3] proposals, and continues to encourage this coordination in order to ensure uniform campaign messaging to the ZEV customer. CSE highly recommends that any ride-and-drive activities undertaken through these programs should be coordinated with CVRP and other statewide (e.g., ARB's Enhanced Fleet Modernization Program) and regional (e.g., San Joaquin Valley Air Pollution Control District's DriveClean rebate) consumer incentive projects.

- **ZEV Car Dealership E&O.** All three utilities recognize the opportunity to market, engage, and educate at car dealerships.[4] CSE supports this dealer-facing approach and strongly suggests that these efforts operate in concert with CSE's CVRP statewide dealership outreach activities or other existing regional dealer education efforts.

III. FURTHER GUIDANCE REGARDING ANONYMIZED AND AGGREGATED DATA IS WARRANTED.

CSE appreciates that each utility plans to collect data and that SCE's[5] and SDG&E's[6] portfolios will be geared to provide "anonymous and aggregated data" for evaluation. CSE is especially supportive of SDG&E's focus on testing and measuring the flexibility of EV charging loads,[7] and its goal to study charging behavior at long-duration public locations.[8]

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[2] *CSE Response,* A.14-10-014, December 5, 2014, page 8-9.

[3] *Response of the Center for Sustainable Energy to Pacific Gas and Electric Company's (U 39 E) Electric Vehicle Infrastructure and Education Program Application,* March 11, 2015, page 9.

[4] PG&E proposes that it may market at local car dealerships; SCE may also engage with EV dealers to promote the pilot at the point of sale; SDG&E proposes to offer EV education and incentives to dealerships and their salespeople to increase EV sales and enhance the associated customer experience.

[5] *Application of Southern California Edison Company for Approval of its 2017 Transportation Electrification Proposals,* January 20, 2017, page 92.

[6] *Application of San Diego Gas & Electric Company (U902E) for Approval of SB 350 Transportation Electrification Proposals;* January 20, 2017, page LB-39.

[7] *Application of San Diego Gas & Electric Company (U902E) for Approval of SB 350 Transportation Electrification Proposals* at 2, states that goals include to "[p]rovide data that will help test and measure the flexibility of EV charging loads and the degree to which the efficient integration of

While these actions generally appear adequate to achieve the Commission's direction regarding measurable monitoring and evaluation criteria,[9] CSE attests to the value and opportunity of a more robust data collection methodology, in which the Commission should consider:

- ***Development of a robust data collection plan.*** CSE recommends the creation of a data collection methodology to ensure uniform reporting across all projects and territories, which will maximize the learning from these investments. Data should be made publicly available, easily shared and accessible, and distributed as openly and widely as possible (while ensuring confidentiality and privacy where needed). Public-facing information provides key feedback on program success, informs policy decision-making processes, and is the basis for program evaluation and research, market characterization and strategic decision-making. Robust, transparent data collection methodologies and sources will inevitably strengthen the long-term design of the TE Programs. With this in mind, the Commission should require:
    - ***Uniform Data.*** Data requirements should be consistent and apply across all selected TE projects and programs. Uniformity supports data collection efficiencies, ensures the program metrics and evaluations are comparable, and promotes quality assurance and control of the data. CSE strongly encourages the Commission to provide guidance on the data sources it plans to hold consistent across all TE programs.
    - ***Data with a defined purpose.*** These programs provide the opportunity for pilots and experiments in a select market segment to accumulate experience that can

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EV loads can yield cost savings to all customers by avoiding future utility infrastructure additions".

[8] *Application of San Diego Gas & Electric Company (U902E) for Approval of SB 350 Transportation Electrification Proposals* at LB-3.

[9] *Assigned Commissioner's Ruling Regarding the Filing of the Transportation Electrification Applications Pursuant to Senate Bill 350,* pages 14 and A1.

inform the scale and design of future projects and targets. As such, collection of program data must enable researchers to assess the effectiveness of these programs, individually and collectively, across a broad set of metrics. Data collection should be oriented to address specific questions, such as cost-effectiveness, diffusion rates, low-income participation, technology/system performance, durability, and other qualitative and quantitative measures. While CSE recognizes that each proposal contains data with some these touchpoints, there will be added value by working across programs to share and communicate learnings from experiences.

- ***Streamlined Data Reporting.*** Data reporting requirements should be based on program requirements and should be easy for programs to track and easy for evaluators to understand. These efforts in turn reduce administrative costs and support the collection (and distribution) of good data.
- ***Deeply Granular Data.*** Data should be reported in the lowest census designation necessary to anonymize data. Reporting data in census designations makes it easier for researchers to associate program data with public data sources and aligns the data with the CalEnviroScreen Tool. Using such a threshold balances the need for data privacy, while reducing loss of information needed by researchers. This data approach will help support the goal to replicate and scale successful projects and initiatives.
- ***Geographical Data***: The Commission should direct the use of a geographical information system (GIS) tool to track the locations of infrastructure installations, consistent with requirements adopted in the original EV infrastructure pilots. Installation data should also be integrated into existing infrastructure datasets, such

as the Department of Energy's Alternative Fueling Station Locator[10] and should be compatible with the California Climate Investments Map.[11]

- ***Categorical Data.*** Data reporting requirements should support measurement not only of basic program information, but also of other priorities, such as GHG emissions reductions and access to financial and health benefits of sustainable energy programs. Data standards should also enable improved market segmentation analyses.
- ***Easily Disseminated Data***. The Commission should publish data via an easily-accessible online portal and provide the data in easily usable formats (such as Excel, Access) and standards GIS formats (such as Keyhole Markup Language/KMZ, ArcGIS shape files, etc.). This data should be updated often, either weekly or biweekly, to expeditiously inform stakeholders of program activity.

This type and level of public-facing information provides key feedback on program success, informs policy decision-making processes, serves as the basis for program evaluation and research, educates market characterization and strategic decision-making, and informs potential replication. Robust, transparent data collection methodologies and sources will inevitably strengthen all of the TE investments over the long-term, as well as inform program iterations. As such, CSE strongly encourages the Commission to direct the utilities to gather information consistent with these seven proposed tenets. Moreover, CSE encourages the Commission to prioritize the "anonymous and aggregated data" discussion as a priority topic

[10] Department of Energy's Alternative Fueling Station Locator, Website Access: http://www.afdc.energy.gov/locator/stations/

[11] California Climate Investments Map; Website Access: http://www.climateinvestmentmap.ca.gov/

in the PACs, which would be consistent with Commission direction to the PACs regarding data advisory on all three previously approved EV applications.[12]

IV. EVALUATE THE USE OF A SINGLE, NEUTRAL, THIRD PARTY PROGRAM OMBUDSMAN TO FACILITATE TE ACTIVITIES.

CSE applauds the program diversity across the Applications. There are currently a total of 21 pilots and programs before the Commission, and 4 rate design proposals. Moreover, smaller electrical corporations will file TE applications by June 30, 2017, which will enlarge this program pool. This vast group of pilots and programs offers California a unique opportunity to learn from the significant rate-payer investment in TE. To maximize the potential impact of the investment, a concerted and expanded effort to harmonize the learnings with the directives of SB 350, the ZEV Action Plan, and other transportation policies, is recommended.

Without this recommended coordination role, CSE is concerned that the lack of uniformity in data collection and informational management across programs may make cross-comparing program activities and general data sharing challenging. This lack of uniformity may lead to "siloed" and disjointed program assessment approaches, which may ultimately lead to uncaptured data and information, resulting in California potentially losing a critical opportunity to learn from the pilots and programs. As such, CSE recommends that the Commission evaluate the use of a single, third-party, statewide ombudsman, to serve as an independent aggregator of program data, information, and lessons learned across all six utility transportation electrification applications and their respective programs. The Ombudsman would work with the utilities, the Commission, and other relevant state agencies (e.g., Governor's Office of Planning and Research, Governor's Office of Business and Economic Development) to provide brand-neutral, unbiased support in areas such as:

[12] D.16-12-065, December 15, 2016, page 70; D.16-01-045, January 28, 2016, page 15; D.16-01-023, January 14, 2016, page 36.

- **Stakeholder Coordination.** The ombudsman could coordinate its activity with advisory committees and other stakeholders and serve as one of the liaisons between advisory committees, the utilities, the Commission, state agencies involved with executing the ZEV Action Plan, and other complementary and or/related programs, including the newly established California Energy Commission Block Grant for EV Chargers program.
- **Data and Information Aggregation.** The ombudsman could collect and aggregate data and information of various program activities. Through online, open-access portals and data dashboards, the ombudsman could manage a centralized and publicly-facing website designed to encourage information and data sharing.
- **Research and Information Sharing.** The ombudsman could facilitate discussions and activities (such as workshops and focus groups) that target stakeholder education and engagement to encourage information and idea-sharing. Topics of discussion could include emergent TE research and policy initiatives. This effort may spawn independent research and data analysis that informs the policy decision making processes related to TE, which would strengthen the TE ecosystem.

Broadly, the use of an ombudsman would strengthen the pursuit of the Commission's SB 350 TE Application Guidance by supporting all programs' trackable performance and accountability measures and continuing cost-effective support and alignment of statewide TE policy and investment.

V. PRIORITIZE TE INVESTMENTS THAT COMPLEMENT STATEWIDE TRANSPORTATION AND INFRASTRUCTURE POLICY INITIATIVES.

The utilities have presented a series of programs that satisfy Commission direction[13] and current policy setting. Nonetheless, these programs would be strengthened by additional

[13] *Assigned Commissioner's Ruling Regarding the Filing of the Transportation Electrification Applications Pursuant to Senate Bill 350,* September 14, 2016.

connectivity to statewide transportation and infrastructure initiatives, including, and not limited to, the following:

- **The California Energy Commission Block Grant for EV Chargers Program.** To encourage funding and partnership collaboration, the Commission should direct the utilities to prioritize ongoing coordination with the recently-approved Block Grant for EV Chargers Program initiative. This program will deploy $200 million in grant funds through various EV charger incentive projects across California during the next five years. The Block Grant program investment has a high propensity to act as an accelerant for the deployment of EVSE and will likely provide opportunities for coordination with these TE programs. In addition, the EV Charger Block Grant Program will record EVSE geographical and locational characteristics, which will support data and research, as well as monitoring and evaluation activities that complement these TE programs. As such, CSE encourages the Commission to direct utility coordination with this emergent program.
- **The Transformative Climate Communities (TCC) Program.** No TE applications mention the TCC Program, yet the TCC Program scoping guidelines prioritize public transit and zero and near-zero emission transportation[14] and discuss the use of smart-grid technologies and energy storage,[15] which complement the innovative approaches of these applications. The TCC program also targets air pollution and GHG emissions reductions and presents the opportunity to showcase targeted programs that support the State's most disadvantaged, and low-and moderate-income households.[16] This suggests well-aligned opportunities for collaboration. In addition, per AB 2722[17] and

[14] *Transformative Climate Communities Draft Scoping Guidelines,* page 6.Website Access: http://sgc.ca.gov/resource%20files/20161123-TCCDraftScopingGuidelines.pdf
[15] *Id.* at 6.
[16] As referenced in policies, including AB 197, SB 1204, SB 1275, SB 535, and AB 1550.
[17] Website Access: https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=201520160AB2722

the State Budget Act of 2016,[18] this program has an established policy framework and an available $140 million allocated across three target areas.

- **Mass Transit/TE Passenger Rail Investments.** Commission direction identifies rail as a potential TE program investment,[19] yet no application plainly develops rail-targeted TE programs. In alignment with current policy, the 2016 ZEV Action Plan prioritizes zero-emission technologies for public transit and freight transport.[20] The State has shovel-ready projects, such as the Caltrain Modernization Program, which will convert Caltrain's less efficient, diesel miles into 88,000,000 kWh of electricity for propulsion in 2020,[21] which will lead to substantial emissions improvement in the corridor. The electricity to propel electrified rail can be supplied by innovative clean distributed and renewable energy technology investments, such as solar PV and wayside energy storage.[22] There are also synergistic opportunities to share resources between projects, which complements Commission direction to "alleviate some of the financial burden on ratepayers."[23] In addition, investments in passenger rail induce mode shift and maintain high participation rates by providing low barriers to access while providing very high capacity on a passenger per mile basis, which complement the Commission's

[18] AB-1613 Budget Act of 2016; Website Access: https://leginfo.legislature.ca.gov/faces/billTextClient.xhtml?bill_id=201520160AB1613
[19] *Assigned Commissioner's Ruling Regarding the Filing of the Transportation Electrification Applications Pursuant to Senate Bill 350*.
[20] *2016 ZEV Action Plan;* Website Access: https://www.gov.ca.gov/docs/2016_ZEV_Action_Plan.pdf
[21] *Peninsula Corridor Electrification Project EIR; Volume I- Revised DEIR;* December 2014; page ES-11; Website Access: http://www.caltrain.com/projectsplans/CaltrainModernization/Modernization/PeninsulaCorridorElectrificationProject/PCEP_FEIR_2014.html
[22] Los Angeles Metro uses Wayside Energy Storage systems, which has resulted in the research, development, production, and installation of systems that use flywheel technology to recycle power generated from rail cars; Website Access: https://www.calnetix.com/newsroom/press-release/vycon-technology-allows-los-angeles-metro-be-first-transit-agency-us-using
[23] *Assigned Commissioner's Ruling Regarding the Filing of the Transportation Electrification Applications Pursuant to Senate Bill 350,* page 27.

policy to maximize benefits and support "improvement of the energy efficiency of travel" in the interests of ratepayers.[24]

From CSE's perspective, prioritizing collaboration in these areas will encourage innovative techniques, promote best practices and resource sharing, and enhance information and idea sharing.

RESPONSE TO SCE'S APPLICATION

VI. SUPPORT FOR SCE'S PRIORITY REVIEW PROJECTS.

CSE supports SCE's priority review projects, including rebates for the residential and electric transit bus make-ready pilots and medium-duty and heavy-duty vehicle charging infrastructure programs. CSE also supports the use of rebates to encourage deployment of EV charging in single-family residences and multi-unit dwellings (MUDs)[25] and finds the rebate approach as outlined for the Rideshare Reward Pilot innovative and unique. CSE provides comments on the following individual programs:

- **Residential Make-Ready Rebate Pilot.** CSE supports SCE's "make ready" approach, which has the ability to accelerate PEV adoption. CSE attests to the value of using rebates in this manner: CSE's PEV Owner Survey results indicate that receiving an incentive significantly influenced adopters to install a Level 2 charging station, with approximately 60% indicating that this subsidy was either "very influential" or "extremely influential" in this decision.[26] While CSE appreciates that SCE suggests the

[24] Pub. Util. Code § 740.8

[25] *Application of Southern California Edison Company for Approval of its 2017 Transportation Electrification Proposals*, January 20, 2017, page 28.

[26] Center for Sustainable Energy; PEV Vehicle Owner Survey February 2014 Survey Report; Website Access: https://cleanvehiclerebate.org/eng/vehicle-owner-survey/feb-2014-survey

use of a trade group's study to determine the EVSE rebate amount,[27] CSE disagrees with this approach and instead encourages the Commission to leverage an advisory committee to provide guidance on the appropriate amount for the rebate. The Commission should consider leveraging the existing PAC for this purpose.

- **Electric Vehicle Driver Rideshare Reward Pilot.** While CSE supports this pilot's innovative approach, CSE does not support SCE's request to work unilaterally with rideshare companies to determine reward requirements and is concerned that this group proposes to unilaterally plan privacy and confidentiality matters.[28] From CSE's perspective, the value of this incentive (and matters pertaining to confidentiality and privacy) should be taken up as items before the PAC and determined based on advice and consultation from the PAC.
- **Urban Direct Current Fast Charge Clusters Pilot.** CSE supports the urban project's focus on major highway corridors[29] and agrees that these installations should receive a rebate to cover the base cost of charging stations deployed through the pilot, including hardware and installation.[30] CSE recommends that the Commission leverage the PAC to provide advice and guidance on SCE's proposed EV charging fees, which SCE has initially envisioned as being set exclusively by the participating customers, at their discretion.[31]

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[27] *Application of Southern California Edison Company for Approval of its 2017 Transportation Electrification Proposals,* at 30, states: "[S]CE will determine the rebate amounts by surveying service providers or through trade group studies".

[28] SCE plans to work with interested rideshare companies to administer the pilot, determine reward requirements, and develop communications to drivers while ensuring compliance with privacy and confidentiality requirements.

[29] *Application of Southern California Edison Company for Approval of its 2017 Transportation Electrification Proposals* at 28.

[30] *Id.* at 38.

[31] *Id.* at 38 states: "Participating customers will be required to provide public access to the charging stations deployed through the pilot, but can determine EV charging fees at their discretion".

CSE suggests that in addition to highways, the Commission should consider directing SCE to prioritize DCFC deployment in high-density, highly-trafficked areas (such as airports, park-and-rides, transit depots, passenger rail stations, and other intermodal hubs) as well as provide further analysis on appropriate use cases for each location. Such a policy has the potential to encourage seamless travel between ZEVs and public transit infrastructure, supports PEV drivers that may not have access to home charging, addresses range anxiety concerns, and promotes the deployment of public charging that can be used by complementary service providers -- such as ZEV taxis and TNC operators -- in and around public transportation facilities. In addition, this synergy is consistent with existing policy, including the development of "mobility hubs",[32] the prioritization of "infrastructure co-location opportunities" embodied in the 2016 ZEV Action Plan,[33] and the prioritization of more compact development patterns that reduce vehicles miles traveled and demand less energy per capita, consistent with the emergent 2030 CARB Scoping Plan.[34]

- **Electric Transit Bus Make-Ready Project.** CSE supports investments in ZEV transit and contends that there is an inherent social value to prioritizing initial investments that focus on DAC regions. CSE agrees with the comments provided by Proterra during the February 8, 2017 TE Application Workshop that electric transit bus

[32] As outlined in California Transportation Plan 2040; California Transportation Plan 2040; Website Access: http://www.dot.ca.gov/hq/tpp/californiatransportationplan2040/Final%20CTP/FINALCTP2040-Report-WebReady.pdf

[33] *2016 ZEV Action Plan,* Goal to: "Consider infrastructure co-location opportunities that can support light-duty, medium-duty and heavy-duty electric vehicle charging and hydrogen fueling station applications in connector site stations (stations along major routes that connect distinct areas of high potential for PEV and FCEV adoption)." Page 29; Website Access: https://www.gov.ca.gov/docs/2016_ZEV_Action_Plan.pdf

[34] *Discussion Draft, 2030 Target Scoping Plan,* Table IV-1. Cross-Sector Relationships, January 20, 2017, Website Access: https://www.arb.ca.gov/cc/scopingplan/2030sp_pp_final.pdf

investments provide a public good that support the State's disadvantaged.[35] Regarding infrastructure barriers, CSE agrees with SCE's statement that upfront costs are the primary barrier preventing transit fleets from adopting electric technologies,[36] and as such, CSE supports SCE's proposal to use rebates for this transit bus infrastructure.

VII. SUPPORT FOR SCE'S STANDARD REVIEW PROJECTS.

CSE supports SCE's standard review programs. However, from CSE's perspective, SCE has drawn a firm line between light and medium/heavy duty charging that could be more flexible than SCE proposes. Accordingly, CSE encourages the Commission to direct SCE to clarify "points of shared compatibility" where PEV charging can be used across all (i.e., light, medium, heavy duty) fleets. This approach aligns well with the Commission's direction to minimize costs and maximize program benefits and is amply justified as the priority review projects proposed by SCE represent the lion's share of their TE program proposal. CSE also provides comments on specific elements of SCE's standard review proposals:

- **At-Scale Medium and Heavy-Duty Vehicle Charging Infrastructure Program.** CSE supports providing rebates to customer participants for charging station equipment where the customer participant will own, maintain, and operate the EVSE. Given the scale and cost of this proposed project, CSE supports this project under the preconditions that: a) unspent/underutilized funds will be

[35] *Comments by Kent Leacock, Proterra; Public Workshop Regarding Investor-Owned Utility Transportation Electrification Applications Pursuant to SB 350 and R.13-11-007.*
[36] *Application of Southern California Edison Company for Approval of its 2017 Transportation Electrification Proposals* at 53. In discussion of *Calstart's Electric Truck and Bus Grid Integration Report,* September 2015; Website Access: http://www.calstart.org/Libraries/Publications/Electric_Truck_Bus_Grid_Integration_Opportunities_Challenges_Recommendations.sflb.ashx.

returned to the ratepayer; and b) the rebate amount will be set in concert with PAC evaluation and recommendation.

- **New Commercial Electric Vehicle Rate Proposal to Promote Electric Vehicle Adoption.** CSE supports the volumetric approach that SCE proposes, as this approach supports the concerted and expeditious planning and action by utilities needed to facilitate the necessary charging infrastructure, electricity price signals, and pricing certainty to support the deployment and utilization of medium- and heavy-duty vehicles. CSE also appreciates that this project will evaluate the "phasing in" of demand charges over time, which will provide medium- and heavy-duty vehicle operators cost flexibility during initial technology adoption phases.

VIII. LEVERAGE SCE'S EXISTING PROGRAM ADVISORY COUNCIL (PAC).

CSE supports SCE's proposed Advisory Board, which can be used to provide useful feedback, improve program processes, and promote program transparency around program implementation.[37] To avoid duplicative process, the Commission should direct SCE to leverage existing PAC resources established under SCE's original Charge Ready and Market Education Program,[38] with updates to this PAC based on the broader TE sector's stakeholders. CSE proposes that the Commission leverage the PACs specifically to provide advice and guidance on program implementation areas, including: a) rebate amounts; b) EV charging fees; and c) the Commercial Electric Vehicle Rate. This advice and guidance would be consistent with SDG&E's currently approved PAC role,[39] where the PAC provides advice on participation payments.

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[37] *Application of Southern California Edison Company for Approval of its 2017 Transportation Electrification Proposals* at 56: SCE "[s]eeks to set up an additional Advisory Board to provide input, guidance, and suggestions on the execution and improvement of the program".
[38] D.16-01-023, January 14, 2016
[39] D.16-01-045, January 28, 2016, page 26.

IX. QUARTERLY, NOT ANNUAL, REPORTING WILL BE WARRANTED.

CSE supports SCE's proposal to provide quarterly status reports to the Commission and other stakeholders.[40] However, regarding data, while CSE appreciates that SCE plans to use anonymous and aggregated data, CSE does not agree with SCE's proposed annual reporting interval.[41] CSE strongly supports quarterly reporting and attests that an annual or semi-annual reporting interval will likely not provide sufficient information necessary to expeditiously inform the Commission and stakeholders regarding TE's market acceleration needs. Accordingly, CSE strongly encourages the Commission to consider establishing a policy of monthly reporting — with a maximum interval of quarterly reporting. This is consistent with practices established under SCE's Charge Ready and Market Education Programs.[42] Moreover, to ensure uniformity across programs, the Commission should direct all TE applications to have standardized quarterly reporting intervals.

X. ALL PROPOSED EVSE PROGRAMS SHOULD HAVE VEHICLE-GRID INTEGRATION (VGI) FUNCTIONALITY.

CSE is encouraged by SCE's support for the assembly of the VGI working group.[43] However, SCE's proposed projects do not clearly prioritize the deployment of EVSE with VGI networking capability. While CSE agrees with SCE that a VGI communication standard is not necessary to execute some of SCE's proposed portfolio,[44] CSE attests to the value of ensuring that these investments have networking capability and functionality to communicate in this

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[40] *Application of Southern California Edison Company for Approval of its 2017 Transportation Electrification Proposals* at 56.
[41] *Application of Southern California Edison Company for Approval of its 2017 Transportation Electrification Proposals* at 92: "SCE plans to report anonymous and aggregated data to the Commission and interested stakeholders annually".
[42] D.16-01-023, January 14, 2016.
[43] *Application of Southern California Edison Company for Approval of its 2017 Transportation Electrification Proposals* at 91: "[F]or this reason, SCE supports the Energy Division proposal for a VGI working group in 2017 to develop high-level criteria, analyze the possible end-to-end communication solutions based on these criteria, develop technical specifications as needed, and make recommendations".
[44] *Id.* at 88.

manner and reminds the Commission that SCE has stated the explicit importance of VGI standardization.[45] In this regard, CSE highly recommends that the Commission give priority to the deployment of PEV charging technology with VGI capabilities, including networking, communication, demand response, and bidirectional charging abilities. Regarding VGI standards, CSE reiterates its former position,[46] with recommendation that the Commission evaluate these programs based on, but not limited to, their ability to:

- React to dynamic pricing to encourage charging during optimal periods for the grid (thus reducing consumer costs);
- Allow for power level variation;
- Be easy-to-use by consumers and not pose unreasonable burden on the consumer when selecting when to charge;
- Protect proprietary consumer, utility, and OEM information; and
- Allow for communication and aggregation in the wholesale market.

Building infrastructure with VGI capability will likely prove to be an effective tactic to avoid future costs and/or negative impacts to ratepayers caused by potential stranded assets or investments that require retrofitting. As such, CSE encourages the Commission to direct SCE to prioritize VGI projects and programs in their Application.

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[45] Comments of Felix Oduyemi of Southern California Edison before the California Energy Commission; *2014 Integrated Energy Policy Report Update (Adopted February 25, 2015.):* "[T] the absence of VGI standards could be a costly value proposition for the state and ratepayers as "we will be stranding a lot of investments if we do not come up with standards that will inform the technology that we deploy." Website Access: http://www.energy.ca.gov/2014publications/CEC-100-2014-001/CEC-100-2014-001-CMF.pdf ; page 107.

[46] *Opening Comments of the Center for Sustainable Energy to the Amended Scoping Memo and Ruling of the Assigned Commissioner and Administrative Law Judge,* May 18, 2016, page 4.

XI. SET 25% DISADVANTAGED COMMUNITIES (DAC) BENCHMARKS, AND TAILOR DAC GOALS TO REFLECT SCE'S TERRITORY DEMOGRAPHICS.

CSE is pleased that SCE's proposal prioritizes the needs of low-income and DACs[47] and supports SCE's proposal to encourage EV ridesharing that increases EV awareness in DACs.[48] These DAC goals should, however, be fortified as specific DAC participation benchmarks, which should be set by the Commission. In this regard, from CSE's perspective, a 25% DAC benchmark best aligns with the existing DAC policy framework.[49] The Commission should consider "set aside" funds in SCE's projects in support of statewide DAC policy. Moreover, the Commission should consider defining the eligible DACs as the top quartile of census tracts per the CalEnviroScreen scores on either a statewide or a utility-wide basis – whichever is broader. This would be consistent with the discretion provided to SDG&E regarding the Electric Vehicle-Grid Integration Pilot Program[50] and SCE's Charge Ready Program.[51] In addition, the Commission should set the benchmarks per AB 1550, which provides additional considerations on how to allocate expenditures to low-income households.[52] Lastly, to avoid confusion and delay, the Commission should expeditiously provide clear direction on the version of CalEnviroScreen that should be used by the utilities to define DACs [i.e., CalEnviroScreen 2.0 versus 3.0 (released January 30, 2017)[53]].

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[47] *Application of Southern California Edison Company for Approval of its 2017 Transportation Electrification Proposals* at 1.
[48] *Id*. at 28.
[49] State laws targeting the importance of GHG reduction and air quality programs for DACs as well as low-and moderate-income communities include AB 197, SB 1204, SB 1275, and SB 535, and AB 1550.
[50] D.16-01-045; January 28, 2016; page 138.
[51] D.16-01-023; January 14, 2016; page 41.
[52] AB 1550 requires that 25% of the Greenhouse Gas Reduction Fund (GGRF) be spent on projects located within disadvantaged communities (DACs) and requires that an additional 5% be spent on projects that benefit low-income households.
[53] CalEnviroScreen 3.0; Website Access: https://oehha.ca.gov/calenviroscreen/report/calenviroscreen-30

XII. CONCLUSION

CSE appreciates the opportunity to provide this Response to SCE's TE Application. CSE strongly supports the Commission's SB 350 rulemaking initiatives and appreciates the Commission's leadership. Efforts such as these strongly align with the Governor's Executive B.16-12, the State's 50/50/50 goals as codified in SB 350, the ZEV Action Plan, and SB 1275.

Respectfully Submitted,

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Sachu Constantine
Director of Policy
Center for Sustainable Energy®
9325 Sky Park Court, Suite 100
San Diego, CA 92123
Tel: (858) 244-1177
sachu.constantine@energycenter.org