

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

Order Instituting Rulemaking to Consider
Alternative-Fueled Vehicle Programs,
Tariffs and Policies.

Rulemaking 13-11-007
(Filed November 14, 2013)

**COMMENTS OF THE NATIONAL ELECTRICAL MANUFACTURERS
ASSOCIATION (NEMA)
ON ORDER INSTITUTING RULEMAKING TO CONSIDER
ALTERNATIVE-FUELED VEHICLE PROGRAMS, TARIFFS, AND POLICIES**

In accordance with Rule 6.2 of the California Public Utilities Commission (CPUC) Rules of Practice and Procedure, the National Electrical Manufacturers Association (NEMA) respectfully submits the following comments on the Order Instituting Rulemaking To Consider Alternative-Fueled Vehicle Programs, Tariffs, and Policies.

NEMA is the association of electrical equipment and medical imaging manufacturers, founded in 1926 and headquartered in Arlington, Virginia. Its 400-plus member companies manufacture a diverse set of products including power transmission and distribution equipment, lighting systems, factory automation and control systems, and medical diagnostic imaging systems. The U.S. electroindustry accounts for more than 7,000 manufacturing facilities, nearly 400,000 workers, and over \$100 billion in total U.S. shipments.

NEMA also represents companies that provide technologies for electric vehicle charging, known as electric vehicle supply equipment (EVSE). NEMA's member companies in the Electric Vehicle Supply Equipment and Systems Section are working to drive innovation, scale, and industry development.

Widespread deployment of plug-in electric vehicles (PEVs), and transportation electrification overall will enhance America's energy security, reduce the cost of powering our vehicles, and improve the quality of the environment.

NEMA appreciates the Commission's leadership in establishing a regulatory and policy structure that encourages customer choice in EV charging infrastructure, rates, and services. NEMA agrees that the EV market and industry are developing rapidly and therefore endorses CPUC's next phase of rulemaking to reassess the landscape and consider responses to current dynamics.

We are pleased that work on the submeter protocol will continue in this proceeding. NEMA supports utility investment to allow for customer-owned submeters for use in billing EV load. We continue to believe that the ability to use low-cost metering technology will lead to a more efficient grid, lower costs to consumers, and greater adoption of EV.

NEMA is a world-recognized leader in the development of standards for electrical equipment, including EVSE and electric meters. As such, NEMA has provided guidance to the CPUC on the accuracy of in-the-field embedded meters, the mechanisms for extracting meter reads, the processes to ensure the accuracy of the meter, and the removability and replaceability of the embedded meter. NEMA's work on standards to support the CPUC continues. NEMA's Submeter/Embedded Meter Working Group remains on target to release in 2014 an application guide and/or a standard, as required by industry.

However, NEMA's standardization activities go well beyond submetering. NEMA is engaged in the development of countless other standards for electrical products and systems, including EVSE charging network interoperability for service roaming, energy storage, building systems, power equipment, and intelligent transportation systems, any of which may be relevant

to future CPUC work.

Because the Commission is considering an array of future policy activities, we offer the following policy principles endorsed by the NEMA Electric Vehicle Supply Equipment and Systems Section.

1. Resale of Electricity

NEMA applauds the work the CPUC has done to exempt EV charging service from utility regulation. State policies should encourage and enable the installation of charging stations at retail and commercial facilities in order to support the broadest possible adoption and the most efficient utilization of PEVs. Commercial charging operations, as a result of reselling electricity, should not be classified as a public utility or subject to regulation by the state public service commission. To do so would inhibit the installation of a robust EV infrastructure system and fundamentally misrepresent the nature of the PEV charging transaction.

2. EVSE Ownership

Allowing the entire spectrum of users, including vehicle owners, property owners, governments, and entrepreneurs to participate as EVSE owners would boost investment, lower costs, and drive more rapid deployment of the technology. To place restrictions on potential ownership models for EVSE would reduce competition and drive up costs for PEV products and services.

3. Metering, Submetering, and Rates

A significant component of the value of transportation electrification is derived from the interaction between the vehicle/EVSE and the electric grid. Keys to delivering this value are the ability to measure electricity use by the vehicle and dynamic electricity rates. Regulators should strive for low-cost, accurate ways to measure PEV electricity use so they can also offer dynamic

rates to the PEV user. Dynamic rates, along with subtractive billing, incent the PEV user to charge during cheaper, off-peak times which maximizes the efficiency of the electric grid.

4. Cost Recovery

As PEV penetration increases, the grid will receive numerous benefits. However, it is also likely that some modest grid infrastructure upgrades will be necessary in some areas to accommodate a high rate of PEV charging. Regulatory bodies should act now to develop clear rules on how the costs for such upgrades and investments should be recovered.

5. Safety

NEMA manufacturers are committed to electrical safety. EVSE has numerous built-in safety features and installation is no more difficult with EVSE than with other large electrical appliances. Regulators should not place unnecessary burdens on qualified electricians for EVSE installation. Increased regulations impose unnecessary barriers to the implementation of EV and EVSE.

NEMA continues to offer itself as a resource to the Commission. Thank you for the opportunity to provide these comments.

Dated: December 13, 2013

Respectfully submitted,

By: _____ /s/

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