

**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)

MOTION OF THE JOINT MINORITY PARTIES FOR PARTY STATUS

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CHAMBER OF COMMERCE

Dated: February 25, 2014

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Pursuant to Rule 1.4 of the California Public Utilities Commission’s (CPUC or Commission) Rules of Practice and Procedure, the National Asian American Coalition, Ecumenical Center for Black Church Studies, Jesse Miranda Center for Hispanic Leadership and the Los Angeles Latino Chamber of Commerce (formerly the Latino Business Chamber of Greater Los Angeles) (hereinafter the—Joint Minority Parties||), hereby respectfully request to be granted party status in the above captioned rulemaking.

I. Joint Minority Parties’ Areas of Interest

The Joint Minority Parties seek to intervene in order to ensure that our state’s 25 million minorities, and California’s many low and moderate income (LMI) consumers, are more easily able to purchase and maintain an electric vehicle (EV) in the coming years, and that they are properly considered in any CPUC decision making and in the context of Governor Brown’s Zero Emission Vehicle (ZEV) Action Plan.

We believe that this Commission takes seriously its obligation to regulate in the public interest – a public interest that, owing to California’s sizeable demographic changes and slow and stubborn economic recovery, should be more geared toward the needs of LMI consumers and the state’s diverse communities. This rulemaking contemplates making policy that will have

repercussions long into the future. As such, it is vital that steps be taken to maximize minority and LMI EV ownership and use. The Joint Minority Parties seek to address the following issues:

a. Infrastructure

The Joint Minority Parties seek to help address the issue of how charging infrastructure can be best deployed so as to both encourage adoption of electric vehicles and ensure that this is done in a way that serves LMI would-be adopters, to the extent possible.

Electric vehicle use has typically been the domain of the more affluent and educated, as well as almost exclusively living in a single-family detached home.¹ We hope that the groundwork laid in this proceeding will ensure that families and individuals living in multi-family housing and earning below \$100,000 a year can help with the adoption of EVs and can reap the benefits of EV ownership.

Ensuring workplace charging will do much to ensure that EVs are available and a realistic option for those living in multi-family housing who may not have reliable access to home charging equipment due to the lack of a private garage.

b. Consumer Awareness

As noted in Governor Brown's February 2013 ZEV Action Plan,—[m]any consumers are unaware that ZEVs are available for purchase or lease. Others don't fully understand ZEV benefits such as operational cost savings, availability of High Occupancy Vehicle (HOV) lanes on state freeways, accessible public charging and—in

¹ A 2012 California Center for Sustainable Energy survey revealed that 52% of California EV drivers have post-graduate education, and that 91% live in a single-family detached home. The survey also showed that over 75% of EV drivers make over \$100,000 a year.

some places—free or reduced parking.|| The Joint Minority Parties concur and believe that there is much this Commission and the utilities can do to assist.

c. Pricing Transparency and Awareness

The Joint Minority Parties wish to intervene in order to make certain that consumers are aware of the benefits off-peak charging, and that consumers are given the opportunity to reap these benefits, such as through submetering to measure separate EV consumption. We also believe that this pricing awareness and transparency must be continued at fueling stations for both electric and hydrogen vehicles.

d. Hydrogen Vehicles

The Joint Minority Parties believe that this proceeding should keep close tabs on the development of hydrogen vehicles and the challenge they may pose to EVs. A long-term and farsighted view of hydrogen vehicle adoption will be essential context for EV adoption. As recently noted by the *Wall Street Journal*, hydrogen vehicles have the potential to meet more of the customer expectations of a gasoline vehicle, and therefore may prove to be more appealing.²

Hydrogen vehicles have emerged as a potential replacement for EVs, and the technology may have progressed to the point that it will be viable for many consumers. We believe that, since Governor Brown’s 2013 ZEV Action Plan, hydrogen vehicles have become—ready for prime time,|| as the CEO of Hyundai North America stated late last

² Mike Ramsey, *Pricey Hydrogen Cars to Challenge Electric*, WALL ST. J., Feb 25, 2014, at B1.

year.³ They may merit inclusion in any discussion on EVs and expanding consumer adoption.

The National Asian American Coalition, Ecumenical Center for Black Church Studies, and the Los Angeles Latino Chamber of Commerce have intervened in numerous proceedings before this Commission, including several utility general rate cases, the green tariff shared renewable proceedings, and the investigation into the shutdown of Edison's San Onofre Nuclear Generating Station.

The Joint Minority Parties wish to add their grassroots perspectives gained from providing direct services to their communities to this proceeding and thereby aid the Commission's decision making.

II. Parties and Service Request

Service of notices, orders, and other correspondence in this proceeding should be directed to the Joint Minority Parties' counsel and representatives at the addresses set forth below:

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³ Think Progress,—Hyundai Will Unveil A Hydrogen Car. What Does That Mean?|| Nov. 19, 2013, *available at*: <<http://thinkprogress.org/climate/2013/11/19/2968891/hyundai-hydrogen-car-means/>>.

Representatives

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February 25, 2014

Respectfully Submitted,

/s/ _____
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