

**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 MARIN CLEAN ENERGY
ON ASSIGNED COMMISSIONER'S SCOPING MEMO AND RULING**

Shalini Swaroop
Regulatory Counsel
MARIN CLEAN ENERGY
781 Lincoln Avenue, Suite 320
San Rafael, CA 94901
Telephone: (415) 464-6040
Facsimile: (415) 459-8095
E-Mail: sswaroop@mcecleanenergy.org

August 29, 2014

**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 MARIN CLEAN ENERGY
ON ASSIGNED COMMISSIONER’S SCOPING MEMO AND RULING**

I. INTRODUCTION

In accordance with the July 16, 2014 *Assigned Commissioner’s Scoping Memo and Ruling* (“Scoping Memo”), Marin Clean Energy (“MCE”) hereby submits the following comments on the proposed scope of Phase I of the instant proceeding.

II. BACKGROUND

MCE is a Community Choice Aggregator (“CCA”), a joint powers not-for-profit public agency that provides electricity generation services for approximately 125,000 customers in the County of Marin and the City of Richmond. In 2015, MCE will expand its services to customers in unincorporated Napa County. MCE customers continue to receive transmission, distribution, billing and other services from Pacific Gas and Electric Company (“PG&E”).

The mission of MCE is to address climate change by reducing energy related Greenhouse Gas (“GHG”) emissions and securing energy supply, price stability, energy efficiencies and local economic and workforce benefits. As the adoption of Electric Vehicles (“EVs”) directly impacts these core operations, and MCE’s service territory has a disproportionately high EV adoption rate, MCE is intently focused on strategically planning for this transition. MCE has identified the following issues which it believes should be included in the scope of the Proceeding:

- Effects on Impacted Communities: The Commission should acknowledge the distinct possibility that increased EV adoption in affluent communities will result in an increase in fossil fuel pollution in impacted communities, and should establish a clear set of guidelines to link electric vehicles and their electricity supply (e.g., by prioritizing EV infrastructure projects that include a renewable generation component).
- Integration with other Renewable Fuel Options: The Commission should give direction on how EV implementation will be integrated with other renewable fuel programs (such as California’s Low Carbon Fuel Standard and the Environmental Protection Agency’s Renewable Fuel Standard 2) in order to avoid the double counting of environmental attributes.
- Proper Attribution of Grid Benefits: In the event that parties that do not administer transmission and distribution services (e.g., CCAs) develop EV infrastructure that provides grid benefits, they should be fairly compensated by the recipient of those grid benefits.
- Monopolization of EV Infrastructure: MCE has deep reservations in regards to the investor owned utilities’ (“IOUs”) interests in building and owning EV infrastructure, as their unique position would allow them to quickly develop an effective monopoly of that infrastructure.
- Access to Data: Given MCE’s efforts to gain access to SmartMeter data, the Commission should consider means of ensuring that data stemming from EV charging systems be readily available to CCAs and other third party program providers (such as Demand Response administrators).

- Coordination with Local Stakeholders : Planning and implementing EV infrastructure should be heavily coordinated with local government partners, CCAs, planning commissions, and community groups in order to maximize benefits.
- Financing Options: The Commission should consider the potential merits of on bill repayment for third party electric vehicle financing.

III. CONCLUSION

MCE thanks assigned Commissioner Carla Peterman, Administrative Law Judge Moosen, and Energy Division staff for the opportunity to provide these comments.

Respectfully submitted,

/s/ Shalini Swaroop

Shalini Swaroop
Regulatory Counsel
MARIN CLEAN ENERGY
781 Lincoln Avenue, Suite 320
San Rafael, CA 94901
Telephone: (415) 464-6040
Facsimile: (415) 459-8095
E-Mail: sswaroop@mcecleanenergy.org

August 29, 2014