

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

Order Instituting Rulemaking on  
the Commission's Own Motion to  
Consider Alternative-Fueled Vehicle  
Tariffs, Infrastructure Rulemaking  
R.13-11-007 and Policies To Support  
California's Greenhouse Gas  
Emissions Reduction Goals.

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

**KnGrid Comments on Scoping Memo Questions**

August 29, 2014  
Stephen G. Davis, CEO  
KnGrid, LLC  
26602 Dapple Grey Drive  
Laguna Hills, CA  
(858) 357-8790  
[sdavis@kngrid.com](mailto:sdavis@kngrid.com)

**KnGrid Comments on California Public Utilities Commission  
Order Instituting Rulemaking to Consider Alternative-Fueled Vehicle Programs,  
Tariffs, and Policies  
Rulemaking 13-11-007 (Filed November 14, 2013)**

KnGrid respectfully submits these comments on the **Assigned Commissioner's Ruling and Scoping Memo**, mailed July 16, 2014.

KnGrid is the exclusive commercial partner of RWE Effizienz GmbH in the NAFTA region. Our mission is to work with automakers (OEMs), electric system operators, fleet owners, electric vehicle service providers (EVSPs) and balancing authorities to facilitate grid-friendly charging (VGI) through vehicle-to-grid communications standards. We're passionate about using this technology to delight plug-in electric vehicle (PEV) owners with a simplified overall experience that also lowers their total cost of ownership, simplifies billing and does it all in the background.

KnGrid supports the California Public Utilities Commission's Alternative Fuel Vehicle (AFV) Guiding Principles, and we believe the Commission should support an increased utility role in electric transportation infrastructure deployment.

PEVs represent a very economical and soft path to decarbonize our world. They leverage an existing fuel delivery system and, as they are essentially 'batteries on wheels' and they're capable of delivering 'cross-cutting' benefits to electric system operators when not on the road and connected to intelligent charging stations.

KnGrid's position is that a faster rollout of L2 workplace and multi-unit dwelling (MuD) charging infrastructure based on intelligent charging standards is central to the anatomy of any strategy aiming to accelerate broad adoption of these vehicles. As installation of adequate charging infrastructure at an MuD or workplace may require trenching and distribution equipment or panel upgrades, this cost hurdle can retard support from landlords not feeling a push to offer this tenant amenity.

## **I. Discussion – Scoping Memo Questions**

KnGrid comments on specific questions raised in Order Instituting Rulemaking (OIR) 13-11-007 are outlined below:

*1) Should the Commission adopt the proposed AFV Guiding Principles? What modifications, if any, are appropriate?*

KnGrid supports the AFV Guiding Principles and suggests that the Commission develop deeper interagency coordination of this OIR with the California Energy Commission and the OEMs themselves.

KnGrid believes that utility demand response (DR) compensation models delivered in plain english will lay the initial foundation for VGI. More grid support applications will surely follow and aggregation rules will come, but the OEMs need this DR clarity now. Needed OEM investments in VGI standards adoption hinge on clarity about cost/benefit. Today, OEMs lack that clarity.

*2) Should the Commission consider an increased role for the utilities in PEV infrastructure deployment and, if so, what should that role be? If the Commission should consider utility ownership of PEV charging infrastructure, how should the Commission evaluate “underserved markets” or “market failure” pursuant to D.11-07-029? What else should the Commission consider when evaluating an increased role for utilities in EV infrastructure deployment?*

We believe that utilities can play a key role in supporting deployment of public and semi-public PEV infrastructure: workplace, MuD and curbside. We believe that the single-family residential domain, where over 80% of PEV charging takes place today offers exciting opportunities for new players to come up with compelling offers for PEV owners that can accelerate adoption of not only PEVs but other distributed generation and residential energy storage breakthroughs essential to state ‘Zero Net Energy’ targets for this domain. It may be that this is the one area where incumbent utility participation might squelch innovation absent some method to level the field of competition.

*3) What education and outreach activities must the utilities provide to support further customer PEV adoption? What existing resources are available for these activities and what additional resources are needed?*

KnGrid is of the opinion that the goal of PEV adoption should not be to merely replace internal combustion engine (ICE) vehicles with PEVs one-for-one. We believe PEV car share represents perhaps the most compelling path forward for California for personal transportation. Studies by the Transportation Sustainability Research Center in Berkeley have revealed that well-developed PEV car share can reduce the number of privately-owned vehicles by 8-to-1 in some cases. The lynchpin of commercial viability for these programs (using a one-way model) is adequate parking and curbside charging infrastructure. For this to happen given the high cost of installing charging stations at curbside locations, utility support may be essential. As PEV Ride & Drive events show, experience with the technology improve consumer PEV purchase propensity. Utility involvement with and support of the growing number of communities that want PEV car share combined with lower cost e-fuel and more ubiquitous charging infrastructure may just be the ‘killer app’ to foster broad adoption. It may also provide a template for how to encourage more use of public transportation in harmony with PEVs.

*4) How should the commission mitigate the impact of demand charges, if at all, on entities pursuing transportation electrification?*

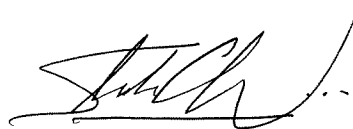
The business model for public charging is challenged enough considering the break-even between gasoline for an efficient hybrid and electricity for a PEV is around \$.27 kWh. Given the marginal cost of a kWh is already in the \$.20's without demand charges, the business model for charge hosts is already dismal. Adding them merely slants the math in a consumer's mind toward gasoline.

## II. Conclusion

KnGrid appreciates this opportunity to share its views with the CPUC on this OIR (13-11-007). We urge the commission to consider an increased role for utilities in public PEV infrastructure deployment while considering methods that foster continued innovation by third parties. We also urge that the CPUC not limit its policy focus so narrowly that it misses an opportunity to evaluate PEVs as an opportunity to reimagine what personal mobility options are possible for a more livable California.

Dated: August 29th, 2014, at Laguna Hills, California

Respectfully Submitted,



Stephen G. Davis, CEO  
KnGrid, LLC  
26602 Dapple Grey Drive  
Laguna Hills, CA 92653  
(858) 357-8790  
sdavis@kngrid.com