

**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)

**THE NATIONAL ELECTRICAL MANUFACTURERS ASSOCIATION  
PHASE 1 COMMENTS  
ON PROPOSED GUIDING PRINCIPLES AND CURRENT PROGRAM ISSUES**

Dated: August 29, 2014

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In accordance with the California Public Utilities Commission (“Commission”) Rules of Practice and Procedure and the July 16, 2014 Assigned Commissioner’s Scoping Memo and Ruling (“Scoping Ruling”), The National Electrical Manufacturers Association (“NEMA”) submits the following Phase 1 Comments on Proposed Guiding Principles and Current Program Issues.<sup>1</sup>

**I. Introduction**

The National Electrical Manufacturers Association (NEMA) is the association of electrical equipment and medical imaging manufacturers, founded in 1926 and headquartered in Rosslyn, 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. Total U.S. shipments for electroindustry products exceed \$100 billion annually. NEMA has a particular interest in this proceeding because a number of NEMA member companies manufacture electric vehicle supply equipment and systems and their components.

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<sup>1</sup> NEMA is concurrently filing a Motion for Party Status in this proceeding.

## **II. Guiding Principles**

The Commission has proposed the following guiding principles for consideration:

- Promote the deployment of safe and reliable AFV grid infrastructure designed to meet transportation and energy service needs while maximizing ratepayer benefits and minimizing costs to all utility customers.
- Target near-term solutions that complement the use of preferred energy resources and utilize the grid efficiently.
- Incorporate and enhance policies from other, related Commission proceedings to promote efficient program implementation and use of ratepayer funding.
- Enable and incorporate the full range of values from vehicle-grid integration (VGI) in a new program as part of the Commission's overall AFV efforts while remaining technology neutral and allowing for business model innovation.

## **III. The Role of the Utility**

The Commission has asked parties to consider an increased role for the utilities in PEV infrastructure deployment. NEMA believes that allowing the entire spectrum of users 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.

NEMA supports a role for utilities in PEV infrastructure deployment. This role should be carefully defined in order to protect competition in the market, enable customer choice, and allow technology to evolve. Utilities differ from other potential EVSE owners because of their position as owners of the electric delivery system, their ability to recover costs of investment through rates, and their relationship with the customer.

NEMA supports utility rate recovery for investments to enhance its system's EVSE readiness. 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 rules on how the costs for such upgrades and investments should be recovered.

However, there must also be clear rules of the road so as not to give any market participant an unfair advantage. Ensuring customer choice is paramount. Competitive issues like access to customers, access to billing data, and sub-metering should be standardized so as not to inflate the utility's place but to level the playing field for other actors to market to customers.

#### **IV. Utility Education and Outreach Activities**

Utilities should also have a role to provide education and outreach to their customers on electricity rates to encourage PEV drivers to charge during cheaper, off-peak times which maximizes the efficiency of the electric grid and enhances the value of driving a PEV. It is also important this information be easily accessible to all types of customers (including residential and commercial customers) and relatively easy to understand.

#### **V. Conclusion**

Widespread deployment of PEV and transportation electrification generally, will enhance America's energy security, reduce the cost of powering our vehicles, and improve the quality of the environment. Policies enabling electric vehicles and associated infrastructure are critical as consumers' demand for PEV is growing along with their expectations that charging will be simple, universal, and affordable.

NEMA appreciates the opportunity to participate in this important proceeding.

Dated: August 29, 2014

Respectfully Submitted,

By: 

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