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)

PHASE 1 COMMENTS OF THE CALIFORNIA EV ALLIANCE ON PROPOSED GUIDING PRINCIPLES AND CURRENT PROGRAM ISSUES

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Pursuant to the California Public Utilities Commission (Commission) Rules of Practice and Procedure and the Assigned Commissioner's Scoping Memo and Ruling, the California Electric Vehicle Alliance (CEVA) respectfully submits the following comments on Proposed Guiding Principles and Current Program Issues. CEVA has filed a motion for party status in this proceeding, and appreciates the Commission's consideration of these comments.

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

The California EV Alliance strongly supports the Commission's proposed guiding principles for the AFV OIR (R.13-11-007):

- 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 VGI in a new program as part of the Commission's overall AFV efforts while remaining technology neutral and allowing for business model innovation.

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In addition to these four principles, the California EV Alliance supports the development of the following key principles, in alignment with other EV stakeholders:

- The Commission should seek to align with related state policy goals including AB 32, the California energy storage mandate, and the Governor's goal of 1.5 million ZEVs by 2025.

- Enable smart AFV grid infrastructure that maximizes ratepayer benefits through networked communication and demand response.

- Foster the development of a competitive market for AFV grid infrastructure technology that protects customer choice and innovation.

- Enable policies that enable equitable access to AFV transportation for Californians at all income levels.

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 a "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 are in agreement that the Commission should consider a role for utilities in advancing infrastructure deployment. Utility resources can meaningfully accelerate progress toward Governor Brown's goal of 1.5 million electric vehicles on the road by 2025. Optimal roles for utilities include the following:

- Development of "make ready" EV charging infrastructure which provides pre-wiring for EV charging stations, including the installation labor, service panels, junction boxes and associated metering and wiring needed to support VGI-enabled EVSE.

We view the direct ownership of EV charging hardware by utilities as potentially problematic because utilities are not optimally incentivized to identify the most consumer-friendly EVSE locations and to collaborate with all appropriate private and public stakeholders in the development of the most consumer-friendly infrastructure. In addition, utility ownership could lead to monopoly pricing power which would disadvantage consumers, and shut out

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competition in this nascent industry. Further, technical innovation would likely suffer in an environment dominated by a small number of utility players. It is vital that the Commission protect customer choice and allow for innovation.

Utility ownership must be cost-effective and provide benefit to ratepayers, which could be measured in terms of grid reliability and resilience, demand response, reduction in energy and energy-related transportation costs, and greenhouse gas reduction goals. These benefits will be considered in the next phase of this proceeding.

Pursuant to Decision 11-07-029, the Commission should consider "underserved markets" as markets where access to products and services are limited. This could include markets where access to charging stations is limited due to the cost of installations, such as multifamily housing or municipalities.

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?**

Utilities could support further customer PEV adoption by educating their customers on the economic and environmental benefits of using electricity as a transportation fuel. Utilities should also provide customers with information on electricity rates and best times to charge their vehicles in order to maximize savings. This information should be easily accessible and simple to understand. In addition, utilities could be directly engaged in other EV market promotion activities, such as "Ride and Drive" events that enable customers to directly experience the benefits of switching to EVs. Utilities should provide information and outreach activities beyond the residential sector – to include commercial customers, public agencies, property managers and developers, and other nonresidential customers.

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

To mitigate these impacts, the Commission should:

- Support demand response programs that provide compensation that offsets demand charges;
- Promote smart EV charging through managed networks that enable load curtailment during critical peak events;
- Encourage utilities to incorporate EV load protections in future ratemaking and resource planning, potentially limiting or eliminating demand charges for select EV applications, such as Fast Chargers that serve inter-regional corridors; and
- Develop incentives for distributed solar or battery energy storage to offset peak demand for EV charging at the site level.

5. **How should the Commission identify and consider in this proceeding best practices achieved and lessons learned from current AFV pilot project results?**

The California EV Alliance has sponsored two important pilot projects designed to mitigate peak demand (and associated demand charges) from EV charging. These include the solar-integrated, battery-backed Fast Charging station installed at the City of Benicia City Hall, and the solar-integrated, battery-backed EVSE in San Francisco multi-unit residential buildings, installed by Powertree Inc. Both projects received California Energy Commission funding developed in partnership with CEVA. We believe that solar-integrated and battery-backed EV charging provides benefits that are strongly aligned with other state energy and transportation policy goals by:

- Effectively mitigating the demand charge challenge;
- Providing enhanced GHG reduction vs. exclusive reliance on grid-supplied electrons; and
- Providing enhanced disaster recovery and resilience through provision of distributed energy resources for local loads, and by enabling e-fueling of vehicles when fossil fuel distribution systems are disrupted.

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It is important that stakeholders as well as the sponsoring IOU have access to pilot data, results, analysis, and that all interested parties have an opportunity to discuss best practices and lessons learned. CEVA looks forward to sharing our pilot project data as it becomes available.

Dated: August 29, 2014

Respectfully submitted,

By: /s/

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