

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

Order Instituting Rulemaking to
Consider Alternative-Fueled Vehicle
Programs, Tariffs and Policies

Rulemaking R.13-11-007
(Filed November 22, 2013)

**COMMENTS OF PROTERRA INC ON THE
ASSIGNED COMMISSIONER'S SCOPING MEMO
AND RULING OF JULY 16, 2014**

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Dated: August 29, 2014

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

Order Instituting Rulemaking on the
Commission's Own Motion to Consider
Alternative-Fueled Vehicle Programs,
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SCOPING MEMO AND RULING OF JULY 16, 2014**

Pursuant to Rules 14.3 and 14.6 of the Commission's Rules of Practice and Procedure in Proceeding 13-11-007, Proterra Inc. ("Proterra") respectfully submits these Comments to the Assigned Commissioner's Scoping Memo and Ruling of July 16, 2014.

INTRODUCTION

Proterra appreciates the opportunity to provide comments agrees that transit fleet operators, in particular, may need special consideration so that demand charges are not prohibitive for utility customers pursuing transportation electrification. Proterra commends the Guiding Principles outlined in Section 3.1.1 and encourages their use going forward in this proceeding. In addition, Proterra hereby addresses Questions 2, 4, and 10 identified in the Scoping Memo and Ruling.

RESPONSES TO SPECIFIC QUESTIONS IN THE ALJ RULING

Question 2 – *Should the Commission consider an increased role for the utilities in Plug-in Electric Vehicle (PEV) infrastructure deployment, and, if so, what should that role be? What else should the Commission consider when evaluating an increased role for utilities in EV infrastructure deployment?*

Proterra supports an increased role for the utilities in Electric Vehicle

Infrastructure deployment because large-scale electrification is necessary to achieve California's aggressive greenhouse gas emission reduction goals and improve air quality throughout the state.

Proterra encourages the Commission to explore the option of permitting the utilities to own the electric vehicle charging equipment. The utilities' traditional role in California's economic system has been to own and manage infrastructure assets that provide the consumer/rate payer with the lowest costs for the investment of rate-payer dollars. The utilities' expertise in this area, with the oversight of the CPUC, will be greatly valued as California expands distributed generation. Applying the utilities' expertise in a similar area, we support utility ownership and management of the equipment that charges PEVs.

In addition, Proterra supports partnerships among utilities and battery manufacturing companies to help level out power demand, provide grid storage in order to help reduce rate charges to municipalities. Proterra also encourages the Commission to examine the option for the utility to rate-base the essential underground infrastructure to help spread the cost across multiple rate payers, and not only the municipality customer.

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

Proterra strongly supports the idea of either eliminating demand charges for electric charged transit buses or creating new tariffs that accurately reflect the economic reality of quick charging (on-route) transit bus technology. Similar to the special rates already offered for light and heavy rail, Proterra supports a special rate designed for

public transit agencies that operate similar technologies not tied to a dedicated railway because demand charges should not be a barrier to transportation electrification technology. In addition, special tariff rates already exist at both Stockton RTD and PG&E and Foothill Transit with SoCal Edison. Policy changes related to electric rate structures will help accelerate the adoption of clean, energy-efficient vehicles.

Question 10 – *Should the Commission recognize the benefits associated with the following VIG impacts:*

- a. *Reduction in Greenhouse Gas (GHG) Emissions;*
- b. *Renewable Portfolio Standard Resource avoided cost;*
- c. *ancillary services avoided cost;*
- d. *decrease in gas consumption as fuel switching benefits; and*
- e. *avoided environmental health costs.*

Proterra supports the Commission’s recognition of the benefits associated with reducing greenhouse gas emissions and decreasing gas consumption. Deploying zero-emission transit bus technology will help achieve California’s aggressive greenhouse gas emission reduction goals, benefit communities throughout the state, and help implement the Governor’s Executive Order to deploy 1.5 million zero-emission vehicles on California roads by 2025. Proterra further supports the Commission’s recognition of the avoided environmental health costs. Zero-emission transit bus advanced technology eliminates the mobile smog-causing emissions from diesel and CNG buses and reduces carbon emissions by 70% or more compared to CNG or diesel buses. Zero-emission transit buses also provide the opportunity for all Californians to ride an electric vehicle and realize the health and other associated benefits.

CONCLUSION

PROTERRA appreciates and supports the Commission's efforts in supporting the PEV market, and looks forward to contributing toward evaluation of new PEV policies and initiatives in this proceeding.

Respectfully Submitted,

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