

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

Application of Southern California Edison
Company (U338E) for Approval of Its Charge
Ready and Market Education Programs

Application 14-10-014
(Filed October 30, 2014)

**SOUTHERN CALIFORNIA EDISON COMPANY'S (U 338-E) RESPONSE TO
ADMINISTRATIVE LAW JUDGE'S JUNE 29, 2018 RULING DIRECTING SOUTHERN
CALIFORNIA EDISON COMPANY TO SUBMIT ADDITIONAL INFORMATION**

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Dated: **July 9, 2018**

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I.

INTRODUCTION

Pursuant to the Rules of Practice and Procedure of the California Public Utilities Commission (“Commission”) and the June 29, 2018 Administrative Law Judge’s ruling directing Southern California Edison Company (“SCE”) to submit additional information, SCE hereby submits this response.

II.

RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION

A. **A detailed timeline of SCE’s expenditures of the \$22 million authorized in D.16-01-023 including:**

1. **The date for when enrollment opened for Phase 1 applications;**

The Pilot started accepting applications on May 27, 2016.

2. **The date when construction first began on the first Charge Ready installation;**

Construction first began on January 18, 2017, for the first Charge Ready Pilot site.

3. **The date when enrollment ended for Phase 1 applications;**

The Charge Ready Pilot stopped accepting applications from non-multi-unit-dwelling applicants on December 14, 2016, and closed the Pilot to all customer segments on January 2, 2017.

4. **Timeline highlighting various budgetary milestones (i.e. how long it took SCE to spend \$5 million in relation to Charge Ready);**

The spreadsheet attached as Appendix A shows the Pilot's quarterly spend.

While SCE is providing this information, it is important to note that the rate of spending for the bridge is not analogous to initial pilot rate of spend. See Section B for further information regarding anticipated bridge funding implementation.

5. **The length of the enrollment period for the \$3.3 million in contingency funds SCE released;**

The Charge Ready Pilot was re-opened on March 9, 2018, and SCE is currently still accepting applications.

6. **When SCE expects all installations funded by the \$22 million approved in D.16-01-023 to be complete; and**

SCE forecasts all Charge Ready Pilot installations to be completed by Q1 2019.

7. **When SCE expects the \$3.3 million in contingency funds to be exhausted.**

SCE expects all remaining funds to be reserved for Charge Ready Pilot sites by July 2018. However, projects that have reserved funding may ultimately not move forward to participate in the Pilot after this period, in which case SCE would use the available funds for waitlisted projects.

B. A detailed budget for the requested bridge funding of \$22 million including:

1. An explanation as to how SCE will allocate the additional \$22 million (2014\$) across the Charge Ready Program with capital and expense budgets separately listed;

The additional \$22 million (2014\$) will be allocated as shown in the table below.

This represents the same level of spend executed in the Pilot.

Capital	(2014\$)
Utility Side Infrastructure	\$ 3,443,532.00
Customer Side Infrastructure	\$ 11,936,387.00
Easement	\$ 115,942.00
Charging Station Testing	\$ 40,000.00
Labor	\$ 563,503.00
Total Capital	\$ 16,099,364.00
O&M	(2014\$)
Labor	\$ 620,890.00
Rebate	\$ 2,450,000.00
Charge Ready - ME&O	\$ 595,000.00
Charge Ready - EV Education	\$ 2,230,600.00
Total O&M	\$ 5,896,490.00
Program Total (2014\$)	\$ 21,995,854.00

2. A detailed outreach plan to improve participation of multi-unit dwellings;

Through SCE's outreach to multi-unit dwelling ("MUD") owners, SCE discovered that owners have little inclination to incur costs that may ultimately be passed on to tenants without seeing a business value for doing so. In order to change this perspective, SCE will shift outreach and education efforts from MUD owners to residents to create more customer demand and show the value of this offering to MUD owners.

Unlike the three other segments served by Charge Ready (i.e. workplaces, destination centers and fleets), MUD tenants are residential customers; therefore, commercial marketing tactics will be augmented with mass market and social media campaigns targeted at MUD residents.

SCE will market to MUD residents using bill inserts, direct mail, and email informing them of the benefits of EVs to them personally (as potentially lower-cost transportation) and to their community. SCE will inform customers of federal, state and local financing and rebate opportunities for new, leased, and used vehicles. SCE will introduce customers in this segment to the Charge Ready Pilot so that they can urge their landlords to install charging stations. SCE will target customers living in our service territory through mass market campaigns, such as social media and local radio and television ads.

To be effective, as with all mass market campaigns, this messaging needs to be continually reinforced. Once started, any disruption to this campaign will result in lost momentum and will require additional expenditures to regain traction. As the other targeted segments are responding to outreach efforts, SCE will reallocate marketing, education, and outreach (“ME&O”) funds to concentrate on MUDs to enable this type of campaign.

3. An explanation for how long the requested \$22 million will allow SCE to continue to operate the program; and

With the requested \$22 million, SCE estimates that at the current installation rate we can continue operations for approximately 18 months and install at least 1,000 additional charging ports to help California meet its EV and environmental goals.

It is important to note that the rate of spending for the Pilot, which took over 24 months to install over 1,000 ports, is not analogous to the rate of spending for this bridge period. This is because SCE now has systems and processes that are already in place, experience with implementing the program, and customers that are already on a waitlist, which is very different from the circumstances when SCE first launched the Pilot in May 2016. The Charge Ready Pilot has been launched for some time and is fully operational. Therefore, additional time for operation start up, including, but not limited to, staff development, EVSE selection and testing, Request For Information (“RFI”) development and execution, and tariff and customer contract development, are not needed to continue the Pilot during the bridge period. Additionally, SCE currently has 11 customers on the waitlist wishing to participate in the Pilot, and an additional 30

customers who may be placed on the waitlist once they reach the next milestone in the participation process. Together, these factors present an opportunity for SCE to leverage investments already made in the Pilot to move swiftly to provide charging station infrastructure to customers and increase outreach to lower-participation segments, such as MUDs, as noted above.

4. **Why \$22 million is the level of funding SCE seeks to fully support the continuation of Charge Ready Phase 1 through any time period between now and any potential adoption of Charge Ready Phase 2.**

SCE requests \$22 million because it expects the funds to be exhausted in approximately 18 months, which is the anticipated duration between the end of the original Charge Ready Pilot and the estimated beginning of Charge Ready 2. As noted in response to question B.3, while the Pilot lasted longer than 24 months with the same funding, implementing this bridge funding will not require time for startup and there are more customers waiting to participate in Charge Ready now than there are existing available funds remaining in the Pilot. Additionally, since the construction phase of the Charge Ready Pilot started, SCE and its contractors and vendors have become more efficient in delivering charging infrastructure to customers.

C. **An explanation of the “market certainty” that would be provided if bridge funding is extended in the Charge Ready Program, including:**

1. **How many customers are on the Charge Ready Program waitlist and how many may be able to participate in Phase 1 without any additional funding;**

SCE currently has 11 customers on the waitlist wishing to participate in the Charge Ready Pilot, and an additional 30 customers with applications in progress whom may be placed on the waitlist once they reach a specific milestone in the process. Without additional funding, SCE forecasts that it can accommodate only one customer from the waitlist. The remaining 40 customers either on the waitlist or in the application process would be unable to participate. The level of interest among customers either already on or likely to be added to the

waitlist in the near term represents approximately 40% of what SCE forecasts to deliver with the requested bridge funding and was reached with limited outreach when the Pilot re-opened. Once additional funding availability is communicated to customers, SCE expects the rate of new application submittals to increase, consistent with what is seen with other incentive programs, such as energy efficiency.

It should also be noted that SCE did not broadly market the reopening of the Pilot and only reached out to customers that had already expressed an interest in participating. SCE expects additional customers would be interested in the Pilot if it was marketed more broadly.

2. **Any plans SCE may have to address the customers on the waitlist going forward if bridge funding is not approved;**

SCE will communicate to customers on the waitlist and to those who have expressed interest in participating in the Pilot that funds are no longer available. The messaging will include that customers have the option to install charging stations on their own without Charge Ready funding, and SCE will support customers who may need help getting started (e.g. information on infrastructure, charging station type, level, etc.).

3. **How much funding would be necessary for all customers on the waitlist to participate in Charge Ready Phase 1;**

SCE estimates that \$9.75 million is necessary to fund the 11 customers on the waitlist and 30 applications still in progress that may soon be placed on the waitlist. This amount includes infrastructure-related costs, charging station rebates, web services for enrollments and labor.

4. **How many customers have “continued to express interest in participating in the program” who are not on the waitlist, and what would be the expected expenditure from bridge funding for these customers; and**

New Pilot applications continue to be submitted, however, the rate of new applications has slowed due to the current lack of funding. As noted above, SCE has not broadly marketed the re-opening of the Pilot due to the lack of funding. Some customers time their

application submittals to align with their own budget and procurement cycles. With bridge funding, we expect an additional influx of applications near the end of 2018 and early part of 2019, which may align with customers' budget and procurement cycles.

5. Whether and how many contracts with contractors and vendors would not be renewed if Charge Ready funding is exhausted.

There are several vendors serving the Pilot: 1) architecture and engineering firms (A&E) to deliver design services for the sites, 2) general contractors to deliver the customer-side infrastructure, 3) web services firm to host and maintain the enrollment portal for customer application submittals, 4) Electric Vehicle Service Equipment (EVSE) providers who manufacture, sell and install the charging stations and 5) Electric Vehicle Network Service Providers (EVNSPs). A total of 4 contractors and 21 EVSE and EVNSPs would not be renewed if Charge Ready funding is exhausted.

Currently, there are two general contractors and the work and labor they are doing for Charge Ready would be discontinued without the necessary funding to continue the Pilot. Similarly, the incremental work and labor the A&E firm is doing for Charge Ready would be discontinued. A separate contract has been developed for web services provided for Charge Ready. This contract would also be discontinued. Additionally, the 13 EVSE providers and 8 EVNSPs would not be needed. Additional opportunities for them to provide products and services to new Charge Ready participants would no longer be available without the necessary funding to continue the Pilot.

D. Detailed information about the potential disruption to SCE internal capabilities that could occur if bridge funding is not approved, including:

1. Whether and how many SCE employees may be reassigned if Charge Ready funding is exhausted; and

In addition to the providers described in Section C.5 above, SCE's Transmission and Distribution ("T&D") organization utilizes SCE employees or contractors to deliver the Charge Ready infrastructure. While some of these employees or contractors would continue to

be used on other programs, the incremental work and labor they are doing for Charge Ready would not continue without bridge funding.

SCE utilizes resources that have been trained and specialized for the Charge Ready effort. For example, there are two field construction managers employed as contractors whose contracts have expired and have not been renewed due to the low volume of work as the Pilot comes to an end. Additionally, there are seven other SCE employees that work specifically on Charge Ready Pilot-related activities. Without the additional funding, all of these employees will be reassigned. While some employees may be reassigned to work on the recently approved medium- and heavy-duty charging infrastructure program, not all of them will because there are other employees currently working on that program.

2. **What level of bridge funding would be adequate to largely prevent employee reassignment and contract cancellation.**

The full \$22 million bridge funding requested would be needed to largely prevent employee reassignment and contract cancellation. Funding below \$22 million would delay employee reassignment and contract cancellation, but would not prevent either.

III.

CONCLUSION

SCE appreciates the opportunity to respond to these questions and respectfully requests that the Commission promptly grant SCE's Petition for Modification of D.16-01-023.

Respectfully submitted,

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/s/ Andrea L. Tozer

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DATE: July 9, 2018

Appendix A

Charge Ready Pilot Program

Quarterly Actual Costs Inception-to-Date (Cumulative)

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A.14-10-014
(Filed October 30, 2014)

CERTIFICATE OF SERVICE

I hereby certify that, pursuant to the Commission's Rules of Practice and Procedure, I have this day served a true copy of **SOUTHERN CALIFORNIA EDISON COMPANY'S (U 338-E) RESPONSE TO ADMINISTRATIVE LAW JUDGE'S JUNE 29, 2018 RULING DIRECTING SOUTHERN CALIFORNIA EDISON COMPANY TO SUBMIT ADDITIONAL INFORMATION** on all parties identified on the attached service list(s) for **A.14-10-014**. Service was effected by one or more means indicated below:

- Transmitting the copies via e-mail to all parties who have provided an e-mail address.
- Placing the copies in sealed envelopes and causing such envelopes to be delivered by US Mail to the offices of the Commissioners(s) or other addresses(s).

**ALJ Sasha Goldberg
CPUC
505 Van Ness Avenue
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Executed this day **July 9, 2018**, at Rosemead, California.

/s/ Sandra Sedano
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California
Public Utilities
Commission



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FILER: SOUTHERN CALIFORNIA EDISON COMPANY
LIST NAME: LIST
LAST CHANGED: JULY 3, 2018

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