BEFORE THE PUBLIC UTILITIES COMMISSION OF THE
STATE OF CALIFORNIA

Application of San Diego Gas & Electric
Company (U 902E) for Approval of SB 350
Transportation Electrification Proposals.

And Consolidated Matters.

Application 17-01-020
(Filed January 20, 2017)

Application 17-01-021
Application 17-01-022

OPENING BRIEF OF SOUTHERN CALIFORNIA EDISON COMPANY (U 338-E) ON
THE STANDARD REVIEW TRANSPORTATION ELECTRIFICATION PROPOSALS
FROM SAN DIEGO GAS & ELECTRIC COMPANY, SOUTHERN CALIFORNIA
EDISON COMPANY, AND PACIFIC GAS AND ELECTRIC COMPANY

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Dated: November 21, 2017
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SUMMARY OF RECOMMENDATIONS

Southern California Edison Company discusses its proposed infrastructure program for medium- and heavy-duty electric vehicle charging and novel rate design for electric vehicle charging in this brief. These proposals will facilitate and accelerate transportation electrification, as required by statute and consistent with regulatory guidance. They will increase access to electricity as a transportation fuel and are essential to reduce petroleum use, meet air quality standards, improve public health, and reduce greenhouse gas emissions. The proposals in this proceeding satisfy the applicable statutory requirements and support California’s ambitious climate goals. The Commission, therefore, should promptly approve the proposals as discussed herein.
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In accordance with Rule 13.11 of the California Public Utilities Commission’s
(“Commission’s”) Rules of Practice and Procedure (“Rules”), and the October 12, 2017 email

California’s landmark Clean Energy and Pollution Reduction Act of 2015, also known as Senate Bill (“SB”) 350, states that “[i]t is the policy of the state and the intent of the Legislature to encourage transportation electrification as a means to achieve ambient air quality standards and the state’s climate goals.”\(^1\) The California Legislature found that “[w]idespread transportation electrification requires electrical corporations to increase access to the use of electricity as a transportation fuel.”\(^2\) SCE’s proposals in this proceeding do exactly that.

\(^1\) Public Utilities (“P.U.”) Code § 740.12(a)(2).
proposed infrastructure program for medium- and heavy-duty electric vehicle (“EV”) charging and innovative rate design for EV charging will facilitate and accelerate transportation electrification (“TE”). The Legislature found that accelerating transportation electrification is essential to reduce petroleum use, meet air quality standards, improve public health, and reduce greenhouse gas (“GHG”) emissions.³ It is essential to facilitate widespread transportation electrification immediately, as California has less than 13 years to achieve its first climate goal milestone (reducing GHG emissions to 40 percent below 1990 levels by 2030).⁴ SCE’s proposals in this proceeding meet the statutory requirements set forth in SB 350 and support California’s ambitious climate goals. The Commission, therefore, should promptly approve SCE’s proposals as discussed herein.

I.

PG&E SMART CHARGE DCFC MAKE READY PROGRAM

This brief only addresses SCE’s proposed standard-review projects. SCE has no comments on PG&E’s proposed program.

II.

SCE AND PG&E MEDIUM- AND HEAVY-DUTY VEHICLE CHARGING PROGRAMS

A. Introduction and SB 350 Transportation Electrification Policy, Goals and Benefits

1. PG&E

This brief only addresses SCE’s proposed standard-review projects. SCE has no comments on PG&E’s proposed program.

2. SCE

a) Procedural History

On January 20, 2017, SCE filed an Application for Approval of its 2017 Transportation Electrification Proposals (“Application”) and served supporting testimony

³ P.U. Code § 740.12(a)(1)(A), (B), (D), and § 740.12(a)(2).
⁴ See Health & Safety Code § 38566.
pursuant to Commissioner Carla Peterman’s September 14, 2016 Assigned Commissioner Ruling Regarding the Filing of Transportation Electrification Applications Pursuant to Senate Bill 350, issued in Rulemaking (“R.”) 13-11-007 (“ACR”). In its Application and supporting testimony, SCE described the Company’s vision for TE, which will reduce GHG emissions and criteria pollutants and provide clean air and other benefits. SCE’s Application and supporting testimony also proposed a portfolio of near-term, priority-review projects, and longer-term, standard-review programs aimed at accelerating widespread TE adoption.


This brief demonstrates that SCE’s proposed Medium- and Heavy-Duty Vehicle Charging Infrastructure Program and New EV Rate Design, as described in SCE’s testimony and modified by the stipulations described herein, satisfy the applicable statutory requirements and regulatory guidance, and should be approved by the Commission without further modification.

b) **SCE’s Medium- and Heavy-Duty Charging Infrastructure Program**

SCE’s proposed Medium- and Heavy-Duty Vehicle Charging Infrastructure Program (“Proposed Program”) will provide participating customers² with

² See Exhibit SCE-01, pp. 53-54, for eligibility requirements.
infrastructure to serve charging equipment for medium-duty, heavy-duty, and non-road electric vehicles. SCE will install, own, and maintain the electric infrastructure up to and including the make-ready stubs. SCE will also provide a rebate to cover the costs of charging equipment that meets SCE’s technical requirements and the installation of that charging equipment. Participating customers will be responsible for procuring qualifying charging equipment and installation services, paying any costs in excess of the rebate amount, maintaining the equipment in working order for the duration of the program, taking service on an eligible time-of-use (“TOU”) rate, and participating in SCE’s data collection plan. SCE forecasts costs of $553,823,000 to implement this five-year program. Although many parties recommended modifications to certain aspects of the Proposed Program, most parties generally supported SCE’s Application and recommended that the Commission approve the Proposed Program.

c) SCE’s New EV Rate Design Proposal

SCE also proposes to establish commercial EV rates to provide a short-, intermediate-, and long-term solution for customers charging EVs (“New EV Rates”). SCE’s three proposed New EV Rates will have the same structure, but will apply to different segments of customers for the exclusive purpose of charging EVs. The New EV Rates will use up-to-date TOU periods consistent with recent Commission guidance to offer price signals that reflect grid conditions. EV customers will be provided price signals that encourage vehicle charging during times of the day when electricity prices are low, in addition to maintaining an attractive overnight charging price (when electricity prices are also low). The New EV Rates will have a five-year introductory period during which SCE will not assess monthly demand chargers; rather, customers’ bills will consist primarily of volumetric energy charges. After the five-year introductory period, SCE will phase demand charges in over a five-year intermediate period.

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6 See Exhibit SCE-01, Appendix C, for eligible vehicles.
7 Exhibit SCE-01, pp. 51, 54.
8 Exhibit SCE-01, p. 57.
9 Exhibit SCE-02, p. 1.
Then, at the end of the tenth year, the rate schedules will reflect stable demand charges that will be lower than what new EV customers would pay on their otherwise applicable (non-EV) commercial rates today.\textsuperscript{10} The New EV Rates are reasonable and incentivize EV adoption, while still making a positive “contribution to margin,” and are supported (with some modifications described in a stipulation) by the parties that provided testimony on SCE’s proposal.\textsuperscript{11}

d) \textbf{SB 350 Mandates Utility Programs and Investments to Accelerate Widespread TE and Meet State Goals}

California’s goals to reduce the state’s total GHG emissions 40 percent below 1990 levels by 2030 and 80 percent below 1990 levels by 2050 are some of the most ambitious in the world and will be difficult to achieve.\textsuperscript{12} SB 350 states that “[i]t is the policy of the state and the intent of the Legislature to encourage transportation electrification as a means to achieve ambient air quality standards and the state’s climate goals.”\textsuperscript{13} SB 350 found that “widespread transportation electrification requires electrical corporations to increase access to the use of electricity as a transportation fuel,”\textsuperscript{14} and directs the Commission to “approve, or modify and approve, programs and investments in transportation electrification, including those that deploy charging infrastructure,” if they accelerate widespread TE, do not unfairly compete with nonutility enterprises, include performance accountability measures, and are in the interests of ratepayers.\textsuperscript{15}

SB 350 makes several findings about the need for and benefits that will arise from widespread TE, and the Commission, like other agencies tasked with implementing

\begin{itemize}
  \item \textsuperscript{10} Exhibit SCE-01, p. 60.
  \item \textsuperscript{11} See Exhibit SCE-01, pp. 70-81; Exhibit Joint-12.
  \item \textsuperscript{12} Exhibit SCE-01, p. 5.
  \item \textsuperscript{13} P.U. Code § 740.12(a)(2).
  \item \textsuperscript{14} P.U. Code § 740.12(a)(1)(E).
  \item \textsuperscript{15} P.U. Code § 740.12(b).
\end{itemize}
the state’s directives, should consider these findings in its review of these applications.\textsuperscript{16} The Legislature found that widespread TE is necessary to:

- Reduce petroleum use, meet air quality standards, improve public health, and achieve GHG emission reduction goals, which include reducing GHG emissions to 40 percent below 1990 levels by 2030 and 80 percent below 1990 levels by 2050;\textsuperscript{17} and

- Achieve the goals of the Charge Ahead California Initiative, which include (1) placing in service at least a million zero-emission and near-zero-emission vehicles by 2023, (2) establishing a self-sustaining California market for zero-emission and near-zero-emission vehicles, (3) increasing access to zero-emission and near-zero-emission vehicles for disadvantaged, low-income, and moderate-income communities, and (4) placing zero-emission and near-zero-emission vehicles in those communities to improve air quality, lower GHGs, and promote overall benefits.\textsuperscript{18}

The Legislature found that widespread TE will create many benefits, including:

- Enhancing air quality, lowering GHG emissions, and promoting overall benefits for disadvantaged communities, low- and moderate-income communities, and others;\textsuperscript{19}

- Stimulating innovation and competition, enabling consumer options, attracting private capital investments, and creating high-quality jobs for Californians;\textsuperscript{20} and

\textsuperscript{16} See P.U. Code § 740.12(a)(2), stating that “[a]gencies designing and implementing regulations, guidelines, plans, and funding programs to reduce greenhouse gas emissions shall take the findings described in paragraph (1) into account.”

\textsuperscript{17} P.U. Code § 740.12(a)(1)(A) and (D).

\textsuperscript{18} P.U. Code § 740.12(a)(1)(B); Health & Safety Code § 44258.4(b).

\textsuperscript{19} P.U. Code § 740.12(a)(1)(C).
• Assisting in grid management, integrating generation from renewable energy resources, and reducing fuel costs for vehicle drivers who charge in a manner consistent with grid conditions.²¹

The Legislature also found that deploying EV charging infrastructure should facilitate increased sales of EVs by making charging easily accessible and should provide the opportunity to access electricity as a fuel that is cleaner and less costly than gasoline or other fossil fuels.²² Furthermore, the benefits of transportation electrification will increase as renewable generation increases. Currently, transportation electrification (on a per-vehicle replacement basis) results in approximately 70 percent fewer GHGs emitted, over 85 percent fewer ozone-forming air pollutants emitted, and 100 percent less petroleum used.²³

e) SCE’s Proposed Programs Will Accelerate Widespread TE, Reduce Dependence on Petroleum, Improve Air Quality, and Reduce GHG Emissions

SCE supports the state’s assessment that a large portion of the state’s GHG and air pollution reductions must come from TE, and SCE believes that deployment of infrastructure by utilities can significantly reduce critical barriers to EV adoption. SCE supports California’s ambitious goals and shares the state’s sense of urgency to facilitate widespread TE to meet those goals. As noted above, California has less than 13 years to achieve its goal of reducing GHG emissions to 40 percent below 1990 levels by 2030.²⁴

SCE’s Proposed Program will help achieve the objectives outlined in SB 350, including accelerating widespread TE, reducing dependence on petroleum, improving air quality, and reducing GHG emissions. SCE’s Proposed Program covers many important

transportation market segments and targets critical barriers to widespread TE adoption, primarily by proposing to reduce the cost and complexity associated with the deployment of charging infrastructure for participating customers. Addressing adoption barriers in major market segments is an essential step to accelerating TE and realizing the benefits of reduced dependence on petroleum, improved air quality, and reduced GHG emissions.

SCE’s Proposed Program mitigates the cost and complexity of deploying charging equipment for medium-duty, heavy-duty, and non-road vehicles. Cost and complexity of deploying charging infrastructure are a significant barrier in TE markets, especially for non-light-duty EV markets, where charging equipment needs to be able to deliver electricity up to 75 times the rate of a typical light-duty EV. Electric utilities have proven capabilities to help customers overcome many of these complexities, and SCE’s Proposed Program will incentivize customers who are interested in adopting electric vehicle technologies, but who may not otherwise electrify without this funding or the utility’s capabilities and experience in deploying infrastructure. Overcoming these barriers and incentivizing adoption will accelerate TE, eliminate the use of fossil fuels, and decrease emissions of air pollutants that directly affect the communities located along goods movement and mass transit routes.

SCE’s Proposed Program will provide many benefits. The Program will accelerate TE adoption. Fueling these vehicles from the grid will provide benefits to the entire Southern California region by reducing GHGs and improving air quality. SCE estimates that by 2030 a net 25 million metric tons of GHG could be reduced from the transportation sector statewide through electric conversion. Achieving the forecast adoption of all medium-duty,

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25 Exhibit SCE-01, p. 53.
26 Exhibit SCE-01, p. 52.
27 Exhibit SCE-01, p. 52.
28 Exhibit SCE-01, p. 53.
29 Exhibit SCE-01, p. 59.
heavy-duty, and non-road vehicles could reduce nitrous oxides ("NOx") emissions by a cumulative 6.7 tons per day.\(^{30}\)

\[ f) \quad \text{SCE’s Proposed Program Provides Direct Ratepayer Benefits} \]

SB 350 amended P.U. Code § 740.8 to require demonstration of both of the following types of ratepayer benefits:

- Safer, more reliable, or less costly gas or electrical service, consistent with §451, including electrical service that is safer, more reliable, or less costly due to either improved use of the electric system or improved integration of renewable energy generation; and

- Any one of the following:
  - Improvement in energy efficiency of travel.
  - Reduction of health and environmental impacts from air pollution.
  - Reduction of greenhouse gas emissions related to electricity and natural gas production and use.
  - Increased use of alternative fuels.
  - Creating high-quality jobs or other economic benefits, including in disadvantaged communities identified pursuant to § 39711 of the Health and Safety Code.\(^{31}\)

SCE’s Proposed Program meets these requirements for both types of ratepayer benefits identified in § 740.8. The Proposed Program contributes to safer, more reliable, or less costly gas or electrical service through improved use of the electric system and improved integration of renewable energy generation.\(^{32}\) TE benefits all customers by spreading the recovery of fixed costs across incremental load, putting downward pressure on electricity

\(^{30}\) Exhibit SCE-01, p. 59.

\(^{31}\) P.U. Code § 740.8.

\(^{32}\) Exhibit SCE-01, pp. 98-99.
rates, improving system utilization, and integrating renewable energy by encouraging EV customers to charge their vehicles when renewable energy is more abundant and load is less costly to serve.\textsuperscript{33}

As discussed above, the Proposed Program supports TE adoption and will help displace petroleum-based fueling with clean electricity, resulting in environmental and societal benefits consistent with §740.8. TE represents the largest opportunity to reduce GHG emissions in California.\textsuperscript{34} TE can also reduce criteria pollutants (e.g., NOx, particulate matter (“PM”)) and improve air quality, creating public health and environmental benefits.\textsuperscript{35}

Specific examples of these benefits are described further below.

(1) **SCE’s Proposed Program Will Promote Safer Electric Service**

SCE’s Proposed Program improves customer and worker safety by following standard transmission and distribution practices and procedures and performing the work safely, and to code, by SCE employees or by certified and licensed contractors.\textsuperscript{36} All installation of make-ready infrastructure on the customer side of the meter not performed by SCE employees will be performed by International Brotherhood of Electrical Workers (“IBEW”) signatory contractors who are Electric Vehicle Infrastructure Training Program (“EVITP”)-approved and using EVITP-certified electricians.\textsuperscript{37} The Proposed Program will also ensure system safety, as SCE will work closely with participating customers to site, size, and deploy electric infrastructure in accordance with SCE’s standards and applicable building and electric codes.\textsuperscript{38} Further, SCE will leverage the expertise of its Advanced Technology Pomona Lab to evaluate charging equipment and ensure safe connection to the grid.\textsuperscript{39}

\textsuperscript{33} Exhibit SCE-01, p. 4.
\textsuperscript{34} Exhibit SCE-01, pp. 8-10.
\textsuperscript{35} Exhibit SCE-01, pp. 11-15.
\textsuperscript{36} Exhibit SCE-01, pp. 58, 98.
\textsuperscript{37} Exhibit SCE-01, p. 87.
\textsuperscript{38} Exhibit SCE-01, p. 87.
\textsuperscript{39} Exhibit SCE-01, p. 87.
(2) **SCE’s Proposed Program Will Encourage Charging in a Way that Improves Grid Reliability**

SCE’s Proposed Program supports grid reliability. Participating customers must take service on a TOU rate, which incentivizes customers to charge their vehicles at off-peak periods, when charging is favorable to the grid and grid impacts are limited.\(^{40}\) As discussed below, SCE’s New EV Rates will use updated TOU periods to incentivize charging during the times of the day when generation oversupply may occur. Daytime charging of EVs (for example, workplaces and fleet vehicles) may absorb excess solar generation and reduce the evening ramp of residential load.\(^{41}\)

(3) **SCE’s Proposed Program Will Support Less Costly Electrical Service**

As discussed above, increasing transportation electrification will put downward pressure on rates, particularly when customers charge at times that are less costly to serve.\(^{42}\) All customers participating in SCE’s Proposed Program will be required to take service on a TOU rate, which encourages charging at times of the day that are less costly to serve and minimize grid impacts.\(^{43}\) Charging at these times improves use of the grid by avoiding potential capacity constraints and minimize the risk of curtailing renewable energy, which is abundant at these times.\(^{44}\)

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\(^{40}\) Exhibit SCE-01, pp. 4, 54.

\(^{41}\) Exhibit SCE-01, pp. 95-96.

\(^{42}\) Exhibit SCE-01, pp. 15-16.

\(^{43}\) Exhibit SCE-01, p. 54.

\(^{44}\) Exhibit SCE-01, p. 74.
SCE’s Proposed Program Encourages the Use of Alternative Fuels, Reduces GHG Emissions, and Reduces the Health and Environmental Impacts from Air Pollution

As discussed above, SCE’s Proposed Program supports the adoption and acceleration of TE. When participating customers adopt electric vehicles, they switch from diesel and gasoline to cleaner electric fuel. Increasing the use of clean electricity as an alternative fuel will reduce GHG emissions and air pollution.45 SCE’s Proposed Program will reduce the health and environmental impacts from air pollution, which are especially severe in the only two basins in the entire country that have a severe non-attainment status for ozone, according to the Environmental Protection Agency. SCE serves both of those air basins.46

Accelerating TE adoption improves air quality and reduces GHG emissions and health and environmental impacts associated with air pollution.47 Any gasoline-fueled trips that are replaced with zero-emission miles will reduce air pollutants and GHG emissions, creating associated environmental and health benefits.48 This is particularly important for neighboring communities that will benefit from TE at the Port of Long Beach, at warehouses and factories, and along freight corridors. Many of these communities qualify as disadvantaged communities as defined by the California Environmental Protection Agency’s (“CalEPA’s”) screening tool (“CalEnviroScreen 3.0”).49

SCE’s Proposed Program Can Encourage High-Quality Jobs and Economic Benefits, Including in Disadvantaged Communities

SCE’s Proposed Program will provide employment opportunities. SCE anticipates that its Program could potentially create many jobs for electricians, engineers,

45 Exhibit SCE-01, pp. 8-12.
46 Exhibit SCE-01, pp. 11-14.
47 Exhibit SCE-01, pp. 11-14.
48 Exhibit SCE-01, p. 37.
49 Exhibit SCE-01, pp. 12-14.
and construction workers. SCE plans to contract for many of the required services, potentially including engineering, design, and construction. SCE participates in the Commission’s voluntary supplier diversity program, which sets a goal of procuring 21.5 percent of the company’s annual spend on goods and services from women, minority, and disabled veteran business enterprises (“WMDVBEs”). These job benefits inure especially in low-income and disadvantaged communities. These communities are burdened not only by increased air pollution, but also by poverty, unemployment, lack of educational attainment, linguistic isolation, and low infant birth rates. SCE’s Proposed Program encourages jobs and economic benefits for these communities, as well as the environmental benefits discussed above.

B. Scope of Projects

The scope and scale of SCE’s Proposed Program are appropriate, consistent with the ACR, necessary to support the state’s goals, and the minimum necessary to provide a clear and certain solution to address market needs. The Program is appropriately scaled to address GHG emissions and consistent with the level of near-term investment needed to support the state’s goals. Any reduction in the size, scope, or duration of the Proposed Program would prevent SCE from achieving the important objectives outlined in SB 350—supporting California’s GHG and air quality goals and accelerating the widespread adoption of TE. This is particularly important in SCE’s territory, as SCE serves the only two air basins in the nation that are in extreme non-attainment for ozone (the South Coast Air Basin and the San Joaquin Valley Air Basin). Further, the Program size and scope will increase competitiveness across TE market

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50 Exhibit SCE-01, p. 95.
51 CPUC General Order 156.
52 Exhibit SCE-01, p. 95.
53 Exhibit SCE-01, p. 52, fn, 108.
54 Exhibit SCE-01, p. 13.
55 Exhibit SCE-02, p. 2.
56 Exhibit SCE-02, p. 2; Exhibit CALSTART-1, pp. 9-10.
57 Exhibit SCE-02, p. 2.
58 Exhibit SCE-02, p. 3.
segments by accommodating both large-scale and small-scale deployments to fit customer needs. 59

SCE’s Proposed Program will address critical barriers for all customers considering electrification. 60 This size, scope, and duration is essential to avoid market uncertainty and support SB 350’s goal of supporting widespread transportation electrification. 61 A five-year program creates market certainty, which is particularly important in the medium- and heavy-duty market, where customers need certainty to manage the significant expense of vehicle acquisition and long times for vehicle procurement and operational adjustments. 62 With an average vehicle life of 17.8 years for medium- and heavy-duty vehicles, customers must feel confident making acquisition decisions now, or the opportunity to convert fossil-fueled vehicles to clean electric vehicles will be delayed for up to two decades. 63

A five-year program also aligns with other funding opportunities to support TE. Consistent with the ACR’s guidance, 64 SCE’s Proposed Program would provide infrastructure necessary to support medium- and heavy-duty vehicles that will likely be able to leverage funding from other sources for the purchase of those vehicles. 65 Further, SCE’s cost-recovery proposal minimizes the risk of a five-year program, because if the customer demand does not materialize, any funds not used will be returned to customers through an annual true-up of the balancing account. 66

59 Exhibit SCE-02, p. 2.
60 Exhibit SCE-02, p. 3.
61 Exhibit SCE-02, p. 3.
62 Exhibit SCE-02, pp. 3-4.
63 Exhibit SCE-01, p. 7.
64 ACR, p. 27.
65 Exhibit SCE-02, p. 4.
66 Exhibit SCE-02, p. 21.
C. Implementation of Projects

1. Program Design
   a) PG&E
      SCE has no comments on PG&E’s proposed program.
   b) SCE
      SCE designed its Proposed Program to maximize the benefits discussed above. For example, SCE proposes to source relevant products and services through a competitive request for proposal (“RFP”) process. When providing a rebate on charging equipment, SCE will follow the base cost methodology developed and tested through the Charge Ready Pilot to minimize costs while meeting the needs of participating customers.\footnote{Exhibit SCE-01, p. 51.} The Proposed Program will further maximize the benefits of TE adoption by requiring participating customers to take service on a TOU rate plan, which incentivizes charging in a manner consistent with grid conditions.\footnote{Exhibit SCE-01, pp. 96-97.} SCE’s proposed New EV Rates will also encourage EV charging during periods of electricity over-generation.\footnote{Exhibit SCE-01, p. 97.} Further, SCE considered feedback from interested parties and agreed to specific program design elements in response.\footnote{See Exhibit Joint-11.}

2. Disadvantaged Communities
   a) PG&E
      SCE has no comments on PG&E’s proposed program.
   b) SCE
      SCE’s Proposed Program will promote accessibility to electric vehicle technologies and provide other benefits in disadvantaged, low-income, and moderate-income communities. About 45 percent of California’s disadvantaged communities, as defined by
CalEPA, are located in SCE’s service territory. Approximately 30 percent of SCE’s customers live in these disadvantaged communities. These communities are heavily impacted by the air and noise pollution resulting from medium- and heavy-duty vehicle traffic. Accelerating TE adoption, especially with electrified fleets of shuttles, buses, and non-road port equipment will contribute to improved air quality in disadvantaged communities, as these communities are often located near sites and roadways where such vehicles operate. Both the ACR and state laws, such as SB 1204, recognize the importance of this benefit to disadvantaged communities. Improving air quality and reducing GHG emissions are important goals of SB 350, but they are especially critical for these communities disproportionately affected by polluted freight corridors and the negative environmental consequences of gasoline- and diesel-powered vehicles.

This is particularly important in SCE’s service territory, which contains some of the largest goods movement infrastructure in the nation. SCE’s territory contains the Port of Long Beach, and goods from the Port of Long Beach and the Port of Los Angeles go through freight corridors, warehouses, and factories in SCE’s service territory. These communities are burdened with increased air pollution, poverty, unemployment, lower educational attainment, linguistic isolation, and low infant birth rates. SCE’s Proposed Program will support electrification of medium-duty, heavy-duty, and non-road vehicles, the largest source of air pollution in these communities.

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21 Exhibit SCE-01, p. 13, fn. 25.
22 SCE, Renger, Tr. 4/472.
23 Exhibit SCE-01, pp. 13-14.
24 ACR at pp. 5, 21-22; see also SB 1204 (“CARB”) grant program for zero- and near-zero emission trucks, buses, and non-road vehicles with a mandate to develop implementation guidance that benefits disadvantaged communities.
26 Exhibit SCE-01, p. 13.
27 Exhibit SCE-01, p. 13.
28 Exhibit SCE-01, p. 13.
SCE is committed to doing its part to improve air quality in disadvantaged communities. SCE, therefore, agreed to reserve 40 percent of total Proposed Program funding for deployment in disadvantaged communities, as defined pursuant to the CalEnviroScreen 3.0, and transit agencies charging electric transit buses. At the halfway point of the Program, SCE may release any unused funds remaining in the reserve for use by other sites that are interested in participating. Transit-dependent customers are disproportionately lower-income individuals and stand to benefit most from riding electric buses, so it is reasonable to include funding going to transit agencies within SCE’s service territory in the 40 percent disadvantaged communities reserve.

SCE aims to target non-residential customers that may meet the Proposed Program’s requirements and solicit them for participation in the program through SCE’s Business Customer Division. In addition, SCE intends to collaborate with government agencies, such as the California Air Resource Board or the California Pollution Control Financing Authority, to reach potential customers in disadvantaged communities.

3. **Customer Marketing, Education and Outreach**

   a) **PG&E**

   SCE has no comments on PG&E’s proposed program.

   b) **SCE**

   SCE recognizes the importance of marketing, education, and outreach (“ME&O”) to achieve adequate deployment volumes and encourage TE. SCE, therefore requested over $1 million in ME&O collateral development and staffing to support the Proposed Program. SCE will collaborate with stakeholders, including community-based organizations, to identify site locations and conduct effective outreach and education. This includes

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79 Exhibit Joint-11.
80 Exhibit Joint-11.
81 Exhibit SCE-01, p. 56
82 Exhibit SCE-02, p. 10.
coordination in areas where charging stations are being deployed to ensure that outreach materials and activities are prepared in appropriate languages and designed to reach and engage low- and moderate-income communities, and that the information is conveyed by organizations that are trusted in the communities. SCE will target its education and outreach to maximize participation by sites that are located in, or will greatly benefit, disadvantaged communities.83

4. **Data Collection, Reporting, Performance Metrics, Collaboration and Advisory Council**

   a) **PG&E**
   
   SCE has no comments on PG&E’s proposed program.

   b) **SCE**
   
   SCE’s Proposed Program contains measurable monitoring and evaluation criteria “to track the progress of the proposed projects and investments in order to ensure that they are timely contributing to the adoption of TE.”84 SCE’s proposed data collection and reporting plan is reasonable and will provide sufficient information to evaluate the Proposed Program’s success and inform future program development. In its quarterly status reports, SCE will include program information and evaluate (i) customer interest and satisfaction; (ii) processes such as procuring deployment services, time, and costs; (iii) post-deployment impacts; (iv) progress and achievements; (v) lessons learned from executing the Program; and (vi) recommendations from an advisory board.85 SCE’s Proposed Program provides measurable monitoring and evaluation criteria, against which to compare SCE’s reports on metrics related to implementation and execution of the Program.86

   SCE will form an advisory board with customers and industry stakeholders to provide input, guidance, and suggestions on the execution and improvement of

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83 Exhibit SCE-02, pp. 10-11.
84 ACR, p. 15.
85 Exhibit SCE-01, p. 56; Exhibit SCE-02, pp. 19-20.
86 Exhibit SCE-01, p. 96.
the Proposed Program. Establishing this type of forum has been very valuable to support SCE’s programs by allowing board members to provide useful feedback, helping SCE improve the programs’ processes, and promoting transparency about the programs’ implementation.87

5. **Other Project-Specific Details**

a) **PG&E**

SCE has no comments on PG&E’s proposed program.

b) **SCE**

SCE did not identify any other project-specific details to be briefed at this time, but reserves the right to respond to issues raised in briefs filed by other parties.

D. **Budgets, Cost Recovery and Ratemaking**

1. **PG&E**

SCE has no comments on PG&E’s proposed program.

2. **SCE**

SCE’s proposed balancing account to record and recover costs for the Proposed Program is an appropriate mechanism for cost recovery. SCE proposes that the revenue requirement associated with actual Program costs would be recorded to the Transportation Electrification Portfolio Balancing Account (“TEPBA”), transferred to the Base Revenue Requirement Balancing Account (“BRBBA”) on an annual basis, and reviewed as part of SCE’s annual ERRA Review proceeding. SCE proposes to continue recording the revenue requirement associated with actual Program costs in the TEPBA until any TEPBA-related costs are included in a future general rate case (“GRC”).88 SCE’s TEPBA is a one-way balancing account with a cap on total funding recovery. In addition, through the operation of the BRRBA, a true-up between the forecast revenue requirement collected in rates and the recorded revenue

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87 Exhibit SCE-01, pp. 55-56.
88 Exhibit SCE-01, p. 101.
requirement occurs annually and, therefore, any unspent collected revenue requirements are returned to customers on an annual basis.\textsuperscript{89}

Should the Commission approve SCE’s Proposed Program, SCE requests that the actual incurred costs be deemed reasonable, as long as they are consistent with the adopted scope of activities and within the cap\textsuperscript{90} adopted by the Commission. Review of the TEPBA in SCE’s annual ERRA Review proceeding will ensure that all entries to the balancing account are stated correctly and are consistent and compliant with Commission decision(s). Commission review should be limited to ensuring all recorded costs are associated with the activities as defined and within the cap approved by the Commission in this proceeding.\textsuperscript{91} The Commission approved the same cost recovery mechanism for SCE’s Charge Ready Pilot Program.\textsuperscript{92}

Consistent with cost-of-service ratemaking principles, SCE is proposing to capitalize the costs of the rebates provided through the Proposed Program and amortize them over the ten-year useful life of the charging station infrastructure.\textsuperscript{93} This treatment results in equitable ratemaking treatment and is consistent with depreciation accounting and Generally Accepted Accounting Principles (“GAAP”). Depreciation accounting is the process of systematically and rationally allocating the costs of an asset over its useful life. This treatment ensures that customers who receive the benefits of an asset’s service bear an equitable portion of its costs. Treating charging station rebates as a regulatory asset and depreciating them over a ten-year life allocates their cost equitably to both current and future customers.

E. **Rate Design**

1. **PG&E**

SCE has no comments on PG&E’s proposed program.

\textsuperscript{89} Exhibit SCE-02, p. 21.
\textsuperscript{90} The cost cap will be based on 2016$, the year in which the cost estimates were prepared.
\textsuperscript{91} Exhibit SCE-01, pp. 102-103.
\textsuperscript{92} See D.16-01-023.
\textsuperscript{93} Exhibit SCE-01, pp. 106-107.
2. **SCE**

The Commission has acknowledged the importance of rate design in incentivizing TE adoption. The ACR stated that “‘[a] long-term solution is needed to resolve the issues related to the elements of tariffs applicable to the operations of electric transit fleets throughout the state.’”\(^{24}\) Further, SB 350 found that “deploying electric vehicles should assist in … reducing fuel costs for vehicle drivers who charge in a manner consistent with electrical grid conditions.”\(^{95}\) The ACR specifically acknowledged that utility applications could propose changing rate structures to address demand charges.\(^{96}\) However, it cautioned utilities to comport with cost causation rate design principles in their proposals.\(^{97}\) SCE’s New EV Rates proposal provides near-, intermediate-, and long-term solutions to address demand charge-related considerations while remaining consistent with cost causation principles and providing a positive contribution to margin.\(^{98}\)

SCE reached agreement with all of the parties that provided testimony on SCE’s rate design proposal, as represented in the stipulation recommending that the Commission approve SCE’s proposal as modified by that stipulation.\(^{99}\) Because SCE’s proposal as modified by the stipulation is reasonable and uncontested, the Commission should approve it.

F. **Competition Issues**

1. **PG&E**

SCE has no comments on PG&E’s proposed program.

\(^{24}\) ACR, p. 20 (internal citation omitted).


\(^{26}\) ACR, p. 20.

\(^{27}\) ACR, p. 20

\(^{28}\) SCE-01, pp. 60, 74-75, 77-81.

\(^{29}\) See Exhibit Joint-12.
2. **SCE**

SCE’s Proposed Programs will follow the same market-neutral approach demonstrated in its Charge Ready Pilot Program. This approach consists of deploying electric infrastructure that the utility owns and maintains while participating customers (i.e., site hosts) select, own, operate, and maintain qualified charging equipment. When qualifying charging equipment, SCE plans to rely on adopted efficiency and safety standards to define its requirements and accept a large number of vendors and charging equipment models, as SCE has done for its Charge Ready Pilot Program. Participating customers, not SCE, ultimately select the qualified charging equipment needed for their operations. This approach allows customers to select equipment that works best for their charging needs, and encourages third-party market participants to provide a variety of established and innovative technologies to meet customer demand. SCE will not compete with third-party market participants to manufacture, sell, own, maintain, or operate the charging equipment.

SCE’s Proposed Program will avoid long-term stranded assets by requiring customers to utilize and maintain charging equipment deployed through the Program. In addition, SCE will not break ground at any sites until participating customers have demonstrated to SCE that they have placed a firm order for charging equipment acceptable to SCE. SCE’s Program also limits the risk of technology obsolescence by deploying make-ready infrastructure that can support a variety of current or future charging technologies.

G. **Other Issues**

1. **PG&E**

SCE has no comments on PG&E’s proposed program.

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100 Exhibit SCE-01, p. 97.
101 Exhibit SCE-01, p. 97.
102 Exhibit SCE-01, p. 54.
103 Exhibit SCE-01, p. 99.
2. **SCE**

SCE did not identify any other issues to be briefed at this time, but reserves the right to respond to issues raised in briefs filed by other parties.

**H. Conclusion**

1. **PG&E**

SCE has no comments on PG&E’s proposed program.

2. **SCE**

For the reasons discussed above, SCE’s Proposed Program and innovative commercial EV rate design meet the requirements of SB 350 and the ACR and, therefore, should be promptly approved by the Commission to support California’s ambitious goals of accelerating widespread transportation electrification, reducing GHG emissions, and improving air quality.

**III. SDG&E RESIDENTIAL CHARGING PROGRAM**

This brief only addresses SCE’s proposed standard-review projects. SCE has no comments on SDG&E’s proposed program.

Respectfully submitted,

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November 21, 2017
BEFORE THE PUBLIC UTILITIES COMMISSION OF THE
STATE OF CALIFORNIA

Application of San Diego Gas & Electric
Company (U 902E) for Approval of SB 350
Transportation Electrification Proposals.

And Consolidated Matters.

Application 17-01-020
(Filed January 20, 2017)

Application 17-01-021
Application 17-01-022

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 OPENING BRIEF OF SOUTHERN CALIFORNIA EDISON
COMPANY (U 338-E) ON THE STANDARD REVIEW TRANSPORTATION
ELECTRIFICATION PROPOSALS FROM SAN DIEGO GAS & ELECTRIC COMPANY,
SOUTHERN CALIFORNIA EDISON COMPANY, AND PACIFIC GAS AND ELECTRIC
COMPANY on all parties identified on the attached service list for: A17-01-020, et al. Service was
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PROCEEDING: A1701020 - SDG&E - FOR APPROVAL
FILER: SAN DIEGO GAS & ELECTRIC COMPANY
LIST NAME: LIST
LAST CHANGED: NOVEMBER 14, 2017

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