

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

Order Instituting Rulemaking to
Continue the Development of Rates
and Infrastructure for Vehicle
Electrification.

Rulemaking 18-12-006

**SOUTHERN CALIFORNIA EDISON COMPANY'S (U 338-E) REPLY COMMENTS ON
SAFETY, TECHNOLOGY, AND STANDARDS**

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Dated: **August 7, 2020**

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I.

INTRODUCTION

Pursuant to the Administrative Law Judge's Ruling Adding Staff Proposal for a Draft Transportation Electrification Framework to the Record and Inviting Party Comments, issued on February 3, 2020 (Ruling), modified in an email ruling, issued on March 24, 2020, and pursuant to the extension granted by Administrative Law Judge Goldberg via email on July 2, 2020, Southern California Edison Company (SCE) respectfully submits these comments on the Safety, Technology and Standards (Sections 7 and 8) of the Transportation Electrification Framework (TEF).

II.
DISCUSSION

A. Utility Distribution and Service Connection Costs for Residential and Commercial Electric Vehicle Charging Infrastructure Warrants Further Discussion

In opening comments, the Utility Consumers' Action Network (UCAN) states that it is premature to make the Rule 15 and 16 exemption that has been offered to residential customers permanent before an analysis is conducted to understand the potential cost shifts.¹ Similarly, the Public Advocates Office at the California Public Utilities Commission (Cal Advocates) states that it does not oppose an extension of the Rule 15 and 16 exemptions at this time but recommends that the exemptions should not be made permanent due to potential cost shifts from electric vehicle (EV) participants to other ratepayers.² SCE recommends that the Commission explore options to ensure that utility-side costs are not a barrier to EV adoption. Further analysis is particularly important to understand barriers related to utility-side costs for non-residential electric vehicle customers. With regard to extending the Rule 15 and 16 exemptions to commercial customers, SCE reiterates³ that this should be explored within a Commission workshop. How the costs are addressed should be considered by the Commission holistically with further analysis of the cost data related to EV infrastructure upgrades. There are multiple options on how these costs can be addressed, which include potential new or modified tariffs.

B. The Emerging Technology Program Can Support EV Market Advancement and Provide Lessons Learned

In opening comments, ChargePoint indicates that the Electric Program Investment Charge Program (EPIC) is a better place for emerging technology pilots.⁴ SCE disagrees

¹ UCAN Comments, pp. 1-2.

² Cal Advocates Comments, p. 4.

³ SCE Comments, p. 11.

⁴ ChargePoint Comments, p. 16.

because EPIC funding is reserved for technology demonstrations, not pilots, and SCE is precluded from using EPIC funding to conduct market facilitation. EPIC funding only covers part of the effort needed to deliver and develop processes and strategies to further advance the EV market and introduce new transportation electrification (TE) fueling technologies or vehicle-grid integration (VGI) programs. EPIC funding is provided through a competitive process, further reducing the likelihood of availability of resources for timely VGI market demonstration projects. An Emerging Markets and Technology program similar to the demand response program could bridge the gap, minimize uncertainty in program success, and accelerate the timeline to deliver these programs to the marketplace. To this end, SCE also disagrees with the Environmental Defense Fund (EDF)⁵ as currently neither the CEC, through EPIC, nor CARB have funded large scale market facilitation projects for potential VGI programs, which would lead to market or program development. SCE supports the recommendation provided in the Vehicle Grid Integration Working Group Final Report, which recommends that policies be developed to fund large-scale market facilitation projects to advance VGI.⁶

BNSF Railway recommends that the IOUs share lessons learned from pilots with all stakeholders.⁷ SCE agrees with BNSF Railway's recommendation and proposes leveraging the Emerging Technology Coordinating Council (ETCC) to provide timely feedback on lessons learned and all work undertaken through the emerging technology pilots. The ETCC is used by the Energy Efficiency Emerging Technology (ET) and Demand Response Emerging Markets and Technology (EM&T) programs as the vehicle to share all interim progress, reports, and lessons learned on tests and demonstrations executed under those programs.

⁵ EDF states that the development, assessment, and introduction of emerging technologies could be sufficiently covered by the programs and regulations currently in place at CEC and CARB. EDF Comments, pp. 12-13.

⁶ See <https://gridworks.org/wp-content/uploads/2020/07/VGI-Working-Group-Final-Report-6.30.20.pdf>, "*Final Report of the California Joint Agencies Vehicle-Grid Integration Working Group*", P. 9, table of policy recommendations, Category 7 "*Fund and launch demonstrations and other activities to accelerate and validate commercialization*".

⁷ BNSF Railway Comments, p. 5.

However, SCE disagrees with BNSF Railway's recommendation that the Emerging Technology Program should limit the scope to just the medium- and heavy-duty market sector.⁸ As detailed by the California Joint Agencies Vehicle Grid Integration Working Group, the light-duty vehicle sector represents a large resource for future VGI programs and should not be ignored.⁹ Finally, SCE agrees that during the development of an EM&T-like program for inclusion within their respective TE Plans (TEPs), the IOUs should coordinate and consult with various public agencies to propose program scope and budget to eliminate redundancies.

C. SCE Provides Dedicated and Expert Staffing Resources to Expedite Processes for Infrastructure via Its Commercial EC Process

In Opening Comments, EVgo asserts that “resource availability issues” remain a barrier and recommends that each IOU TEP include an assessment of staffing needs for both utility TE programs and also “to expedite processes for infrastructure demand outside of the utility TE programs.”¹⁰ In addition, EVgo recommends that each IOU be required to have department-level support with dedicated EVSE staff that can carry out field analysis, utility asset evaluation, distribution planning and engineering, desktop reviews and utility inspection.¹¹ SCE agrees that dedicated and expert staffing resources are critical, and SCE provides this support to third-party EV providers via SCE's Commercial EV process. SCE provides a single point of contact to the EV developer, dedicated field inspectors, and dedicated planners. However, attempting to include an assessment of infrastructure staffing needs in IOU TEPs is unlikely to produce an informative or precise understanding of staffing needs. SCE planners, field crews, inspectors, and others all support multiple work streams and are prioritized as workload and scope changes. For example, SCE has dedicated Planners for EV work when it is submitted for design, but those

⁸ BNSF Railway Comments, pp. 5-6.

⁹ VGI Working Group Final Report June 30, 2020, pp. 27-33, available at <https://gridworks.org/wp-content/uploads/2020/07/VGI-Working-Group-Final-Report-6.30.20.pdf>.

¹⁰ EVgo Comments, p. 8.

¹¹ EVgo Comments, pp. 8-9.

Planners will shift to other design work when the EV submittal volume slows. As such, trying to determine staffing needs will be challenging and imprecise.

D. Third-Parties Should Not Have Access to Energized Primary Structures

EVgo recommends that the larger utilities train either the largest EVSPs or designated distribution contractors on “safe access” certifications adequate to open and inspect items such as transformer enclosures.¹² SCE takes significant measures to ensure public safety and the safety of its employees. SCE does not allow third-party access to energized primary structures. SCE already has a defined process in place that provides field inspection results to third-party providers upon request. SCE provides inspection service prior to work order design to inform the customer’s needs and inspection service throughout the design and construction process as necessary with a uniform inspection request process. This service is provided to EV developers via SCE’s Commercial EV process and to individual requestors via SCE’s Local Planning offices. Additionally, EV developers will require SCE validation, inspection of existing SCE structures and work order design for any proposed project that connects to the SCE distribution system. Due to these standard requirements, there are significant safety risks, with no significant benefits, to allowing third-party access to SCE structures prior to a new service request. The Commission should reject EDF’s proposal as SCE’s existing processes are appropriate to ensure safety.

III.

CONCLUSION

SCE appreciates the opportunity to provide these comments to the Commission.

¹² EVgo Comments, p. 10.

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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) REPLY COMMENTS ON SAFETY, TECHNOLOGY, AND STANDARDS** on all parties identified on the attached service list **R.18-12-006**. 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 via U.S. Mail to the office of the ALJ(s) or other addresses.

ALJ Patrick Doherty
California Public Utilities Commission
505 Van Ness Ave.
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ALJ Sasha Goldberg
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Executed this **August 7, 2020**, at Downey, California.

/s/ Karen Abarca
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