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)

SOUTHERN CALIFORNIA EDISON COMPANY’S (U 338-E) COMMENTS IN
RESPONSE TO AMENDED SCOPING MEMO AND RULING OF THE ASSIGNED
COMMISSIONER AND ADMINISTRATIVE LAW JUDGE

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Dated: May 18, 2016
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I.

INTRODUCTION

Pursuant to the Amended Scoping Memo and Ruling of the Assigned Commissioner and Administrative Law Judge (Scoping Memo) dated March 30, 2016, SCE respectfully submits the following comments. SCE’s comments respond to the questions and issues raised in Appendix B of the Scoping Memo, as well as the comments presented and issues discussed at the April 8, 2016 California Public Utilities Commission (Commission) and California Air Resources Board (CARB) “Electric Utility Workgroup Meeting on Advanced Clean Transit,” and the April 29, 2016 Commission workshop, in collaboration with the CARB and California Energy Commission (CEC), on Transportation Electrification Issues Raised by Senate Bill (SB) 350 (“the workgroup meeting and workshop, respectively”) in this proceeding.

In light of the information presented in the workshops and SCE’s many years of engagement in the transportation electrification (TE) industry, SCE recommends that the Commission adopt the following principles in its Assigned Commissioner Ruling inviting TE applications:
- Recognize the need for expedited, large-scale adoption of TE— to meet state goals, including those pursuant to SB 350 and federal requirements;
- Recognize the need for a broad, comprehensive role for utilities in this space, as envisioned by SB 350;
- Affirm the necessity of coordination between the utilities, regulators, public-interest, and business stakeholders to fully leverage key sources of knowledge and capital;
- Allow utilities to exercise discretion to develop TE application timelines, select TE market segments and charging locations, and design market strategies tailored to local needs; and
- Set a strong long-term foundation for future TE programs while expediting programs and pilots in the near-term to provide necessary data, analysis, and experience to improve longer-term programs.

Based on the foregoing principles, SCE recommends a three-phased approach to implement the TE provisions of SB 350. As shown in the table below, this approach allows the Commission and utilities to gain a deeper understanding of how to accelerate widespread TE adoption through near-term pilots and programs in the next five years while also allowing the new Integrated Resource Plan (IRP) OIR process to proceed in parallel. Data from the near-term programs can and should inform the IRP’s long-term planning and scenario modeling process and TE applications and policies in the next decade.

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1 Senate Bill No. 350.
2 The National Ambient Air Quality Standards for criteria air pollutants have attainment deadlines in extreme non-attainment districts of 2023 and 2032 for key pollutants.
3 See Rulemaking (R.) 16-02-007.
4 Pursuant to Public Utilities Code Sections §§ 454.51- 454.52, the Commission will adopt a process by 2017 for each load-serving entity (LSE) to file an IRP that identifies a diverse and balanced portfolio of resources, including renewable energy, storage, energy efficiency, and TE, for each LSE to meet GHG-reduction and other goals. TE applications in the next decade would likely need to be based on each utility’s approved IRP.
**Table 1 - SCE Recommended TE Phases to SB 350 Implementation**

<table>
<thead>
<tr>
<th>Phases</th>
<th>Phase 1</th>
<th>Phase 2</th>
<th>Phase 3</th>
</tr>
</thead>
<tbody>
<tr>
<td>Goal</td>
<td>Market Launch</td>
<td>Transition</td>
<td>Based on Commission-Approved Integrated Resources Plan</td>
</tr>
<tr>
<td>Application Examples</td>
<td>Applications for pilots to accelerate light-duty EVs</td>
<td>First application to accelerate other EVs: e-freight, e-transit and/or e-ports; Broader application to accelerate light-duty EVs</td>
<td>All types of TE applications in an approved IRP</td>
</tr>
<tr>
<td>Application design guidelines</td>
<td>No Commission guidelines for applications; evaluated pursuant to D.14-12-079 (case-by-case balancing test)</td>
<td>Based on guidelines adopted in Assigned Commissioner Ruling (SCE recommends that a modified version of the guidelines in Scoping Memo Appendix A be adopted); evaluated based on two-pathway approach described below</td>
<td>IRP OIR will establish a recurring planning process to identify the portfolios of resources, including renewable energy, energy efficiency, storage, and TE, for each utility to meet greenhouse gas (GHG)-reduction and other goals pursuant to SB 350</td>
</tr>
</tbody>
</table>

In addition, SCE recommends that the Commission establish two distinct approval pathways for TE applications. The first pathway would allow the Commission to “fast-track” certain TE applications, potentially with up-front, achievable approval standards. This pathway should be available to foundational TE efforts such as investments in “make-ready” charging and propulsion infrastructure, market education and outreach (ME&O) programs, and electric vehicle (EV) pilot projects. The second pathway is a “business-as-usual” approach for other TE applications, and should apply to any programs or investments that go beyond those determined to be eligible for the “fast-track” pathway.
Finally, SCE supports the Energy Division’s “straw proposal” for TE application design guidelines with a few modifications. SCE recommends that these guidelines be qualitative in nature, without attribution or numerical tests at this point. Accelerating TE adoption in the near-term is essential, and appropriate long-term TE policy can and should be developed in later phases of the AFV OIR and IRP OIR, informed by data and learnings from new and existing TE programs.

II.

ACCELERATED, LARGE-SCALE ADOPTION OF TE AS PART OF A LONG-TERM UTILITY EFFORT IS NEEDED

A. TE Provides Important Benefits.

According to the 2008 State Alternative Fuels Plan adopted by CARB and the CEC, “light-, medium-, and heavy-duty vehicle electrification results in approximately 70 percent fewer greenhouse gases emitted, over 85 percent fewer ozone-forming pollutants emitted, and 100 percent fewer petroleum used. These reductions will become larger as renewable generation increases.” Since 2008, these benefits have increased significantly due to expanding penetration of renewable energy on the electric grid, and these benefits will continue to increase as utilities progress toward the 50 percent renewable portfolio standard required by 2030, pursuant to SB 350.²

Moreover, TE reduces up to three times more GHGs per kWh than electric sector renewable generation or energy efficiency (EE). With respect to smog-forming NOx, light-duty

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5 Mark-up of this straw proposal is in Appendix 1 attached.
6 PUB. UTIL. CODE § 740.12 (a)(I).
7 Senate Bill No. 350 amended Public Utilities Code section 399.15 to require a 50 percent renewable portfolio standard by 2030.
8 This analysis uses fuel-source CO₂ emission factors for different vehicle types (p. 32), the CA electricity grid (p. 66), and vehicle energy economy ratios (EER) (p. 45) listed in the Low Carbon Fuel Standard regulation (http://www.arb.ca.gov/regact/2015/lcfs2015/lcfsfinalregorder.pdf). The analysis then compares net CO₂ reductions per kWh from electrifying a light-duty vehicle, heavy-

Continued on the next page
EVs reduce emissions up to eight times more than renewable generation or EE, and medium- and heavy-duty electric vehicles reduce emissions by up to sixty times per kWh.9

B. **Large-Scale Adoption of TE is Necessary to Meet State Goals and Federal Requirements.**

During both the April 8 and April 29 workshops on TE, representatives from regulatory agencies, the Governor’s office, industry stakeholders, and subject matter experts emphasized the importance of expedient electrification of the transportation sector for meeting state goals, the requirements of SB 350, and federal air quality requirements. Important comments by CARB and the Governor’s Office are highlighted below.

1. **California Air Resources Board**

CARB provided data demonstrating that the transportation sector accounts for 50 percent of the state’s GHG emissions, 80 percent of ozone-forming NOx emissions, and 95 percent of

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9 This analysis uses vehicle (light-duty Table 37, p. 69); heavy-duty (Table 49, p. 80) and upstream fuel emission factors (Table 32, p. 65) from Phase 1 of the California Transportation Electrification Assessment (TEA) Study (2014) (http://www.caletc.com/wp-content/uploads/2014/09/CalETC_TEA_Phase_1-FINAL_Updated_092014.pdf). The analysis then compares net NOx reductions per MJ from electrifying a light-duty vehicle and heavy-duty vehicle with the NOx reductions per MJ from the addition of zero-emission renewable energy or energy efficiency. Because the California electricity grid is already so clean, we can realize greater reductions by removing gasoline- and diesel-burning vehicles from the road relative to offsetting average electric generation facilities with additional renewable energy generation or energy efficiency (i.e., e-Trucks reduce 1.6 times more; electric light-duty passenger vehicles reduce 2.2 time more; e-Buses reduce 3.1 times more).
Of these three areas, the federal air quality requirements for ozone (of which NOx is the primary precursor) especially spurs the need for large-scale adoption of TE according to the CARB-led Vision for Clean Air study and Vision model. Based on this model, CARB opined that 4.3 million light-duty zero-emission vehicles (ZEVs) are needed by 2030, and large numbers of non-light-duty vehicles are also needed. Similarly, the Vision for Clean Air study found that in addition to the “nearly complete transformation of passenger vehicles to zero-emission technologies, approximately 80 percent of the truck fleet” would need to be zero- or near-zero-emission technology, and “nearly all locomotives operating in the South Coast air basin” would need to be using some form of zero-emission technology.”

2. **Governor’s Office**

Cliff Rechtschaffen, the Governor’s Senior Advisor, noted that Governor Jerry Brown committed to ensuring that all vehicles in California be zero-emission by 2050. He also

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10 See [http://www.arb.ca.gov/board/books/2015/102215/15-8-6pres.pdf](http://www.arb.ca.gov/board/books/2015/102215/15-8-6pres.pdf) at 4, which includes upstream emissions. Note: the charts shown by CARB at the April 29 workshop do not include the upstream refinery emissions, but are “tank-to-wheels.”

11 Vision for Clean Air: A Framework for Air Quality and Climate Planning 19-20, California Air Resources Board, South Coast Air Quality Management District, and San Joaquin Valley Unified Air Pollution Control District (June 27, 2012), available at: [http://www.arb.ca.gov/planning/vision/docs/vision_for_clean_air_public_review_draft.pdf](http://www.arb.ca.gov/planning/vision/docs/vision_for_clean_air_public_review_draft.pdf). This statistic shows the South Coast Air Basin and the San Joaquin Valley Air Basin. At the April 29 workshop Energy Division staff also made this same point.

12 Analisa Bevin presentation and comments at the April 29 workshop. Examples of non-light-duty TE includes electric medium- and heavy-duty electric trucks, buses and shuttles, port equipment, forklifts, and airport ground support equipment. ICF International also presented the California Transportation Assessment, in which California was forecasted to see over 1.6 million electric trucks and over 450,000 non-road EVs by 2030. See Table 12; available at [http://www.caletc.com/wp-content/uploads/2014/09/CalETC_TEA_Phase_1-FINAL_Updated_092014.pdf](http://www.caletc.com/wp-content/uploads/2014/09/CalETC_TEA_Phase_1-FINAL_Updated_092014.pdf).

13 Vision for Clean Air: A Framework for Air Quality and Climate Planning 4, California Air Resources Board, South Coast Air Quality Management District, and San Joaquin Valley Unified Air Pollution Control District, (June 27, 2012), available at [http://www.arb.ca.gov/planning/vision/docs/vision_for_clean_air_public_review_draft.pdf](http://www.arb.ca.gov/planning/vision/docs/vision_for_clean_air_public_review_draft.pdf).

mentioned the upcoming 2016 Governor’s Interagency ZEV Action Plan, which will update the 2013 plan and the 2015 draft update. The ZEV Action Plan will provide detailed directives to many state agencies on their role in implementing the state’s ZEV goals, acknowledging the state’s need for TE.\textsuperscript{15}

C. **Essential TE Adoption Must Accelerate.**

SCE agrees with Commissioner Peterman, CAISO Board member Ferron, and Governor’s Senior Advisor Rechtschaffen that we must accelerate TE adoption.\textsuperscript{16} With over 25 light-duty EVs currently in the market, and over 25 more EVs expected to be released soon,\textsuperscript{17} the EV market is clearly ready for accelerated adoption. Furthermore, as noted by several industry experts at the April 29 workshop,\textsuperscript{18} medium- and heavy-duty electric vehicles are also available and ready for accelerated adoption.


\textsuperscript{16} Comments at the April 29 workshop.


\textsuperscript{18} For example, at the April 29 workshop, representatives from CalStart and EPRI noted that non-light-duty EV technologies and batteries in general are developing faster than expected. Also the CEC’s Tim Olson commented that electric MDVs and HDVs are ready to scale up into the 1000s of units in operation.
As shown in Figure 1, “Transportation Electrification Assessment” by E3 and ICF International and Lawrence Berkeley National Lab (LBNL), the scope and magnitude of this adoption challenge is daunting. Achieving the recommended six to fifteen million light-duty EVs by 2030 will require active participation from all stakeholders, including utilities. A slow adoption rate (shown by the dashed line in Figure 1) would require such rapid acceleration of EV adoption from 2030 to 2050 that it would be too costly or simply infeasible to achieve.

According to experts such as Electric Power Research Institute and the National Renewable Energy Lab, the need for charging infrastructure in long dwell time locations is not only very

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large but also not being installed at a rate fast enough to meet the “LBNL High Electrification Scenario” in Figure 1.\textsuperscript{20}

Moreover, for the growing but nascent EV market, the next two to three years are critical for establishing a longer-term growth rate in EV adoption, as the market is expect to include near-term introduction of several more affordable, longer-range vehicles.\textsuperscript{21} SCE believes that the adoption of these vehicles, supported by a growing charging network, could catalyze broad adoption of EVs at the rate necessary (see Figure 1) to achieve California’s EV goals. In order to capture this opportunity, it is essential to expedite the near-term growth in EV infrastructure.

D. The Utility Role in TE Adoption Should Be a Long-Term Effort.

TE efforts by utilities should be both a near- and long-term effort. Further, SB 350 clearly links utility efforts to accelerate widespread TE adoption to helping meet long-term air-quality requirements\textsuperscript{22} and the state’s GHG-reduction goals.\textsuperscript{23} While the utilities’ role will likely change over time, utility efforts could easily require a multi-decade approach, analogous to the

\textsuperscript{20} To achieve the trajectory shown by the red line in Figure 1 above, approximately 260,000 to 650,000 charging ports outside of single-family homes would be required in California by 2020 and three to eight million charging ports outside of single-family homes would be required in California by 2030. This kind of growth will be nothing short of transformational, and requires overcoming multiple challenges. These ranges are based on SCE assessment of several forecasts concluding that low estimates for attach rates (a metric that compares number of away-from-home charging ports compared to total number of PEVs) are between 15\% and 25\%, while high estimates are between 46\% and 53\%. Forecasts analyzed were: NREL: CA Statewide PEV Infrastructure Assessment (June 2014); EPRI: Guidelines for Infrastructure Planning “RedLine/BlueLine Method” (December 2012); UC Davis: Away from Home Charging (May 2014); and ChargePoint: Long-Term Vehicle Charging Plans (April 2014).

\textsuperscript{21} For example, the 2017 Chevrolet Bolt EV with 200+ miles of range per charge is priced before incentives at $37,500, and the 2018 Tesla model 3 EV with 215+ miles of range per charge is priced at $35,000 before incentives. Both cars receive $9,000 in federal and state incentives. See http://www.motortrend.com/news/2017-chevrolet-bolt-ev-starts-at-37000/ and http://www.cnet.com/roadshow/auto/2018-tesla-model-3-review/.

\textsuperscript{22} The South Coast and the San Joaquin Valley are the only two extreme non-attainment areas for air quality in the nation, with an attainment deadline of 2032 and an estimated deadline of 2037 for the new, more stringent ozone standard.

\textsuperscript{23} Governor Brown has set ambitious climate change goals that include GHG-emission-reduction targets of 40 percent below 1990 levels by 2030 and 80 percent below 1990 levels by 2050 and reducing petroleum use by up to 2030.
on-going efforts to transform the markets for renewable electricity generation and energy efficiency.

III.

UTILITIES MUST HAVE A BROAD, COMPREHENSIVE ROLE IN TRANSPORTATION ELECTRIFICATION

When developing the upcoming Assigned Commissioner Ruling, the Commission should consider analogous sections of SB 350 that describe the interaction between utility investment and related programs such as cap-and-trade, disadvantaged community efforts, and the new integrated resources plan. Specifically:

- PU Code 701.1 adds TE as a principal goal of electric utility resource planning and investment on equal footing with a list of previous principal goals, including energy efficiency and renewable resources;
- Public Resources Code 25327 directs several state agencies to address barriers for disadvantaged communities;
- PU Code 454.52 describes the newly required IRP for LSEs such as utilities, which includes TE as well as many other goals;24
- PU Code 399.13 directs the Commission regarding TE and the renewables portfolio standard; and
- Health and Safety Code 44258.5 directs the California Air Resources Board regarding removing barriers to TE related to the cap-and-trade program.

These provisions envision an expanded role for utilities in TE, and must be considered when developing the guidelines for implementation. In light of the statutory language,25 and the needs delineated above, all types of TE should be within the scope of this proceeding and all

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24 SB 350 also requires an IRP for publicly-owned electric utilities. See PUB. UTIL. CODE § 9621.
locations for TE charging and propulsion infrastructure, at all charging levels, should similarly be in scope. All utility efforts to facilitate TE should be in scope, especially those that are within the core competencies of the Commission and the utilities.

Given the large-scale need for transformation, accelerated, long-term efforts by the utilities are necessary. Utility-funded efforts allow limited state agency funds to realize maximum benefits as the state agency funds can be focused on vehicle incentives, while the utility can support development of the charging infrastructure.

Additionally, utility investment in charging infrastructure can help overcome the long-term barriers to away-from-home charging installation such as high-cost, complexity, and revenue risk. For example, even though site hosts recognize the benefits of charging infrastructure ownership, chargers do not fit the classic pay-back/return on investment paradigm. The high costs of infrastructure and installation to provide non-residential charging capability, coupled with relatively low volumes and an inexpensive commodity (electricity) being sold, make a sustainable business model challenging.

26 Specifically charging at single-family residences, multi-unit dwellings, fleets, workplaces, short-dwell public, curbside, and long-dwell destination centers should be in scope for the AFV OIR. In addition, charging locations such as disadvantaged communities, low-income communities, rural and urban communities should be in scope. And all charging levels from 1 kW to over 300 kW should be in scope. It is too early in the development of the TE market to exclude any of these areas from the scope of this proceeding. Every segment must be considered to address the challenge of meeting SB 350’s requirements.


29 Installed charging stations can range in price from $10,000 for Level 2 charging stations to over $100,000 for a DC Fast Charger.
IV.
PUBLIC-PRIVATE COLLABORATION IS NECESSARY TO ACHIEVE THE STATE’S GOALS

SCE echoes comments made by other stakeholders that coordination among utilities and other parties will increase the likelihood of success.30 Well-structured relationships can provide experience and access to information that can improve future program design and benefit other public and private sector stakeholders. Collaboration will also help to accelerate TE, in support of the state’s ambitious goals, while optimizing funding. SCE looks forward to collaborating with other stakeholders, as appropriate, to maximize the benefits of utility programs.

V.
GUIDELINES SHOULD ALLOW FLEXIBILITY FOR UTILITY PROGRAMS

SCE agrees with PG&E that it is important for the upcoming Assigned Commissioner Ruling to allow for regional differences between utilities, including how utilities develop their application timelines, select TE market segments and charging locations, and develop go-to-market strategies.31 Some areas within a utility service territory have port and logistics challenges, while other areas have extreme non-attainment areas for National Ambient Air Quality Standards (NAAQS) with very difficult deadlines. In addition, flexibility for utilities to customize their proposals will enable the creativity that is needed at this early market stage. In developing guidelines, the Commission should balance articulating criteria to facilitate speedy review of the next round of applications against proscribing one-size-fits-all directives that limit utilities’ ability to tailor programs to meet regional needs. The case-by-case approach ordered in D-14-12-079 remains appropriate to evaluate these distinct proposals. As discussed below, SCE

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30 For example, comments made by Energy Division staff and Commissioner Peterman at the April 29 workshop.
recommends that the Commission expedite the process of reviewing the utilities’ applications by adopting a dual-pathways approach.

VI.

THE GUIDELINES SHOULD FOCUS ON STRUCTURAL FEATURES

SCE recommends that the Commission guidelines for TE applications focus on assessing the fundamental structural integrity of the utilities’ programs. At this early stage of the market, with so many uncertainties about vehicle and battery technology, consumer adoption, and charging behavior, it is impossible to know the best approach for deploying infrastructure in away-from-home or fleet locations. What utilities can realistically strive for and the Commission can actually assess ex ante is whether utilities have developed proposals that incorporate ingredients necessary for success. The Energy Division’s straw proposal for application design guidelines, with slight modifications discussed below, is appropriate to ensure success.

Ex post evaluation of programs should be forward looking, focusing on how to target and refine the next round of utility investment, not on determining whether the level of adoption that occurred (or not) is attributable (or not) to the utility’s program. To this end, a key structural feature of the utilities’ proposals should be a set of clearly specified questions to be explored by the program, along with an experimental design and data collection program to support robust analyses. Long-term continuous improvement of TE programs, investments, and processes was a consensus theme at the workshop, and this applies to both the utilities and the Commission. SCE supports the assertion that creativity is essential. Utility proposals should address areas where TE adoption is just starting, or is lacking, and also areas where adoption is already happening and could be accelerated. Including an evaluation plan ensures that such experimentation will yield actionable insights.
VII.
THE ACR SHOULD SET A STRONG FOUNDATION FOR FUTURE TE PROGRAMS

SCE agrees with Commissioner Peterman that a strong foundation for long-term TE programs and investments by utilities is essential.\textsuperscript{32} New utility TE programs and investments over the next five years will provide important data to help support and inform the IRP.

Such programs and investments need not be delayed due to the current lack of appropriate quantitative analyses. As stated by industry expert E3, an appropriate cost-benefit test does not currently exist to evaluate beneficial load such as TE.\textsuperscript{33} As a result, SCE recommends that TE programs should be evaluated qualitatively at a portfolio level, as numerical, quantitative tests at the TE portfolio or individual program element level are premature at this time. The Commission is uniquely situated to be a “thought leader” on this subject and to develop solutions that may be adopted by other states.\textsuperscript{34} While a new framework is necessary for TE at scale, TE adoption should not be delayed for three to four years pending the approval of an IRP. Instead, the ACR should require the utilities to submit applications for TE programs and investments during the next five years, as suggested by Appendix A in the March 30 Scoping Memo.

VIII.
SCE’S PROPOSAL TO IMPLEMENT THE TE PORTIONS OF SB 350


SCE believes that the experience gained and data provided from utility programs and investments in 2016-2020 will inform the IRP scenario modeling and subsequent optimization.

\textsuperscript{32} Commissioner Peterman’s comments at the April 29 workshop.
\textsuperscript{33} Comments by Eric Cutter, Director at E3 (Energy+Environmental Economics) at April 29 workshop. Further, SCE believes the existing cost-benefit tests in the Standard Practices Manual were designed for a different situation and are not appropriate for programs to accelerate TE under SB 350.
\textsuperscript{34} Eric Cutter at the April 29 workshop.
processes, as well as the individual IRPs for each LSE. Additionally, these programs can improve TE application design guidelines for new TE applications that are filed post-IRP approval.

In support of state goals to accelerate widespread TE and meet air quality requirements and GHG goals, SCE recommends that the Commission adopt two distinct pathways for Commission approval of applications for TE programs and investments: Pathway One – an expedited process for “no regrets,” foundational TE efforts, and Pathway Two – a “business as usual,” traditional approach for more complex projects that do not meet the criteria for Pathway One.

1. **Pathway One – expedited process for foundational TE efforts:**

SCE recommends that certain “no-regrets” TE programs and investments be considered eligible for an expedited, “fast-track” process, including, but not limited to: investments in “make readies” for charging and propulsion infrastructure, incentives for charging stations, ME&O, TE pilots, research, development and demonstration (RD&D) programs, Low Carbon Fuel Standard (LCFS) programs, and new rates designed to facilitate TE. In particular, “make ready” investments situated at “long dwell-time” locations should be prioritized for “Pathway One,” as such locations are widely recognized as the most common charging location for all types of EVs and are key to quickly advancing state transportation and environmental goals.

SCE recommends that the Commission adopt a set of simple, flexible guidelines, similar to the Energy Division’s straw proposal in Appendix A, for the types of programs described above in order to qualify for “Pathway One” approval. An expedited, pre-approval framework

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35 “Make ready” investments include both: (1) charging infrastructure—up to and including the stub-out, but not the charging station; and (2) propulsion infrastructure—up to but not including the catenary or other wayside power technologies.

36 Examples of such locations include workplaces, residences, fleets and destination centers. Daytime charging in these locations could seek to address renewables integration. Efforts targeting single family homes could start with those in disadvantaged or low-income communities.
for such programs, similar to existing “fast-track” energy procurement approaches, would help to facilitate long-term market transformation for TE in support of the state’s transportation and environmental goals. Such a process could use the Advice Letter process, and would apply to utility programs that meet certain pre-established criteria as determined by the Commission. The Pathway One process would allow utilities that comply with said criteria to be eligible for cost recovery approval without an “after-the-fact” reasonableness review. Any measurement and performance accountability measures would be used specifically for the purpose of helping inform utilities in designing and refining subsequent TE programs. Additional scrutiny should occur only if a program does not meet the pre-established criteria to qualify for the Pathway One process.

2. **Pathway Two – traditional process for TE efforts that do not fit within the guidelines established for Pathway One:**

SCE recommends that utilities have flexibility to decide the types of TE programs to propose, regardless of whether they would qualify for Pathway One or Two. Because the TE market is nascent, a utility should be able to propose innovative programs and investments that properly require a traditional Commission adjudication. For these more novel or complex programs, the additional scrutiny afforded by traditional Commission review is appropriate under Pathway Two.

**B. TE Programs in the Long-Term Period – Beyond 2020.**

SCE recommends that in the long term (post 2020), support and acceleration of TE is even more important, as ME&O, charging and propulsion infrastructure, and solar over-supply will continue to be barriers that the utilities can and should address using the many tools available to them. Utilities in this phase should design programs to meet the TE target (or range of TE adoption) in their approved IRP. By this stage, with five years of experience and data
IX.

RESPONSES TO QUESTIONS OUTLINED IN APPENDIX B OF THE SCOPING MEMO

In the following section, SCE provides responses to the four questions outlined in Appendix B of the Scoping Memo.

1. **In what ways should the Application Guidance Straw Proposal in Appendix A of this Scoping Memo be modified to better align with the mandate of SB 350?**

   SCE supports a qualitative approach to program design guidelines over the next five years, as an appropriate numerical test cannot be quickly developed at this time. Specific proposed changes to the Straw Proposal are attached in Appendix 1 hereto and explained below.

   - SCE supports SB 350’s goal to “seek” to minimize costs and maximize benefits, recognizing that requiring such parameters could conflict with other long-term energy and environmental goals (e.g. meeting 2050 air-quality goals or supporting and enhancing customer choice). This language ensures flexibility in harmonizing the goals of 350 with state and federal environmental goals.

   - Similarly, SCE recommends promoting, rather than requiring, coordination with the many planning and transportation agencies listed in the Straw Proposal to support SB 350 goals. Required coordination with planning and transportation agencies for infrastructure investments for long-dwell charging locations selected by customers is not necessary as these locations are particularly low risk.

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37 CAL. PUB. UTIL. CODE § 740.12(b), “Programs proposed by electrical corporations shall seek to minimize overall costs and maximize overall benefits.”
• The Straw Proposal’s goal to “prioritize sectors with high emission reduction potentials” should be amended to include consideration of other long-term transportation and environmental policy goals, including regional air-quality requirements and state petroleum-reduction goals.

• The Straw Proposal’s goal to “ensure driver, customer and workplace safety” should be rephrased to only include aspects that are under utility control. Safety is of the utmost importance to SCE, but it can only seek to ensure safety of infrastructure within its control. SCE recommends rephrasing this goal as: “work to ensure safety of all infrastructure that is owned or operated by the utility.”

2. **In light of current industry development and technology availability, should the Commission focus on particular transportation sectors or market barriers (e.g., light, medium or heavy duty vehicles, fuel types, or specific applications), and why?**

SCE recommends that utilities be given the flexibility to determine segment prioritization, based on the unique characteristics and needs of their respective regions, and the challenges they face in meeting NAAQS.

3. **What needs for standard development, research, and development, or pilot projects exist that should be addressed by the Commission? What ongoing initiatives may be ready for increased scale?**

SCE recommends that: (1) market education and outreach, (2) investments in make-readies for charging and propulsion infrastructure, (3) electric rates that are designed to support TE, and (4) LCFS programs are ready for scaling. However, SCE emphasizes the need for regional flexibility, and cautions against implementing a “one-size-fits-all” approach. SCE also recognizes the need for standards development, additional research and development, and pilot projects, and is active in all three areas.
4. **What should the application guidance ruling consider about the issues raised in the ARB workgroup meeting of April 8, 2016, and the issues raised at the April 29, 2016 workshop?**

SCE’s comments above thoroughly discuss the issues— including those discussed at both the April 8 workgroup meeting and the April 29 workshop— that the guidance ruling should consider.

**X. CONCLUSION**

SCE appreciates the opportunity to submit comments and respectfully requests that the Commission consider the above remarks in this rulemaking process.

Respectfully submitted,

FADIA R. KHOURY
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/s/ Andrea L. Tozer
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May 18, 2016
Appendix 1

Detailed mark-up of Appendix A: SB 350 Transportation Electrification

Application Guidance Straw Proposal: General Guidance
1. Applications should propose 2-5 year pilots and/or programs with associated budgets.
2. Initiatives may be regional or statewide, but must consider regional transportation conditions and plans and leverage federal funds.
3. Applications should seek to:
   a. Minimize overall costs and maximize overall benefits.
   b. Prioritize sectors with high emissions-reduction potential while also considering regional air quality requirements and state petroleum reduction goals.
      1. Consider potential for technology maturation and market transformation.
      2. Leverage natural turnover and high-impact decision makers.
4. Applications must:
   a. Minimize cost and maximize benefit. Account for ratepayer interest as defined in Section 740.8.
   b. Protect/promote competitive markets and complement private investments.
      i. Prioritize sectors with high emissions reduction potentials.
         1. Consider potential for technology maturation and market transformation.
         2. Leverage natural turnover and high-impact decision makers.
   c. Align with California policies.
      i. Complement, inform, and coordinate with existing state agency initiatives at the California Energy Commission (CEC) and ARB (and other agencies), Governor’s Executive Orders (B-16-2012, B-30-15, and B-32-15)/International ZEV Alliance, and CAISO initiatives, specifically:
         1. Coordinate with Regional Plans (SB 375, Fixing America’s Surface Transportation “FAST” Act) & Infrastructure Readiness Plans (AB 8, AB 118).
         2. Coordinate with standardization efforts (SB 454, P.U. Code 740.2).
         3. Coordinate with other SB 350 initiatives, the California Vehicle-Grid Integration Roadmap, and CAISO distributed resource proceedings (e.g. ESDER, DERP).
         4. Coordinate with CEC and ARB research and forecasting initiatives, demonstration and pilot programs, and outreach and education activities.
         5. Promote diversity in customer and community access, economic development, and supply chain development (SB 1275, SB 535, CPUC and CEC’s supplier diversity goals).
      ii. Complement, inform, and coordinate with other CPUC initiatives.
   d. Fit with CPUC and IOU/core competencies and capabilities
   e. Ensure driver, customer, and worker safety. Work to ensure safety of all infrastructure that is owned or operated by the utility.
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)

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) COMMENTS IN RESPONSE TO AMENDED SCOPING MEMO AND RULING OF THE ASSIGNED COMMISSIONER AND ADMINISTRATIVE LAW JUDGE on all parties identified on the attached service list(s) R.13-11-007. Service was effected by one or more means indicated below:

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  ALJ: John S. Wong
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  505 Van Ness Avenue
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Executed this May 18, 2016, at Rosemead, California.
/s/ Mildred King

Mildred King

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<th>Name</th>
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<tr>
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<td>ERIC HUFFAKER</td>
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<td>GERALD LAHR</td>
<td>ENERGY PROGRAMS MGR.</td>
<td>101 8TH ST.</td>
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<td>JIM BAAK</td>
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<td>TIM LINDL</td>
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<td>RYAN SCHUCHARD</td>
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