

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

Application of Southern California Edison  
Company (U 338-E) for Approval of its Charge  
Ready 2 Infrastructure and Market Education  
Programs.

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Application 18-06-015  
Filed June 26, 2018

**SOUTHERN CALIFORNIA EDISON COMPANY'S (U 338-E)  
NOTICE OF *EX PARTE* COMMUNICATION**

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**Dated: July 19, 2018**

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Pursuant to Rule 8.4(a) of the Rules of Practice and Procedure of the California Public Utilities Commission (“Commission”), Southern California Edison Company (“SCE”) hereby gives notice of the following *ex parte* communication in the above-referenced proceeding.

On Monday, July 16, 2018, at 2:00 p.m., representatives from SCE met with Jennifer Kalafut, advisor to Commissioner Peterman. Nidhi Thaker, Chief for Strategy and External Affairs for President Michael Picker, joined the meeting at approximately 2:15 p.m. At 2:30 p.m., representatives from SCE met with Joanna Gubman, advisor to Commissioner Randolph, and Rachel Peterson, chief of staff to Commissioner Randolph. At 3:00 p.m. representatives from SCE met with Maria Sotero, advisor to Commissioner Martha Guzman Aceves. The meetings took place at the Commission’s offices located at 505 Van Ness Avenue in San Francisco, and each lasted approximately 30 minutes. Attending each of the meetings on behalf of SCE were Caroline Choi, Senior Vice President of Regulatory Affairs, Michael Backstrom, Managing Director of Energy and Environmental Policy, and Laura Genao, Managing Director

of Regulatory Affairs. The meetings with Ms. Kalafut, Ms. Thaker, Ms. Gubman, Ms. Peterson, and Ms. Sotero were requested by SCE. SCE provided the attached written materials during the meetings.

In each meeting, SCE provided a high-level overview of the Charge Ready 2 program, described its reasons for making changes from the Charge Ready Pilot, and explained how SCE plans to conduct outreach for the Charge Ready 2 program. In the meetings, SCE also discussed the reduction in the minimum number of ports per site, the need for curbside charging, the appropriateness of 30% as a minimum for deployment in disadvantaged communities, the special barriers to deployment faced by multi-unit dwellings, how SCE might establish the one-time participation payment for the turnkey option, how Uber and Lyft are participating in the program development, and the timing of the application filing.

In the meeting with Ms. Kalafut and Ms. Thaker, SCE explained that the make-ready expansion program is the aspect of Charge Ready 2 with the most urgent near-term need for timely approval. SCE explained that this, in addition to the bridge funding requested in SCE's petition to modify D.16-01-023, is essential to continue deploying infrastructure to increase charging station installation.<sup>1</sup>

During the meeting with Ms. Kalafut and Ms. Thaker, SCE committed to confirm whether the CALGreen Building Code applies to new, non-residential, commercial buildings. Pursuant to Rule 8.2(c)(3)(a), SCE hereby confirms that CALGreen applies to both new residential and non-residential construction.

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<sup>1</sup> SCE did not schedule this meeting with the intent to discuss the petition for modification currently pending in A.14-10-014, but because issues pending in the petition arose in the course of the communication, SCE is noticing this ex parte communication in A.14-10-014 as well as in A.18-06-015.

ANNA VALDBERG  
ANDREA L. TOZER

*/s/ Andrea L. Tozer*

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By: Andrea L. Tozer

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**Dated: July 19, 2018**

**ATTACHMENT**

**Proposed Charge Ready 2 Program**



# Proposed Charge Ready 2 Program

Energy for What's Ahead

# Executive summary

- SCE wants to support and accelerate the adoption of light-duty EVs in California in support of State climate and air quality goals, to reach up to 7 million vehicles statewide by 2030.
- Charge Ready 2 (CR2) proposal: a four-year, \$760M (2018\$) program - \$561M in capital \$199M in O&M – for EV fueling infrastructure to support 48,000 new charging ports and for increased marketing, education, and outreach (ME&O) activity.
- CR2 would meet one-third of charging needs in SCE territory for the applicable segments by 2023.

Charge Ready 2 Portfolio Programs	Type of Program	Targeted Number of Ports	Target Customer Segments	Purpose
Make-Ready Expansion	Infrastructure + electric vehicle supply equipment (EVSE) Rebate	32,000	MUD / Workplace / Destination Center / Fleet	A continued focus on away-from-home charging at workplace and public charging locations as well as charging at MUDs.
<i>SCE Own &amp; Operate (ports included in SCE Make-Ready Expansion total)</i>	<i>Infrastructure</i>	<i>up to 4,230</i>	<i>MUD / Government</i>	New solution to address the unique challenges faced by MUDs and government entities. One-third of SCE customers live in MUDs and have limited access to at-home charging options.
New Construction Rebate	Rebate	16,000	MUD	New solution to address the unique challenges faced by MUDs. Rebates to cover all or part of the costs of charging equipment in newly constructed MUDs.
EV Awareness Campaign	Service	N/A	All Customers	A robust marketing, education and outreach program for all customers.
Customer Education Campaign	Service	N/A	Prospective EV owners	
TE Advisory Services	Service	N/A	Business Customers	

# The need for Charge Ready 2

- California's GHG and environmental goals are some of the most ambitious in the world and will take significant deliberate action to meet.
- Achieving California's carbon reduction and air quality goals cost-effectively requires a broad set of actions across every part of the economy (*see SCE's Clean Power and Electrification Pathway recommendations*).
- Substantial transportation sector electrification is needed to meet the State's environmental goals
  - The Governor has set a target of 5 million zero-emission vehicles in California by 2030
  - SCE's analysis finds that nearly 7 million light-duty EVs will be needed statewide, in combination with other measures, by 2030
- Barriers continue to impede EV adoption (*range anxiety and lack of awareness*).
- Accelerating and sustaining light-duty EV adoption requires market transformation; using the success and learnings from the Charge Ready Pilot, SCE's CR2 portfolio is intended to help spur this transformation.

# Stakeholder engagement for Charge Ready 2

- To ensure alignment and support, SCE actively sought feedback from public agencies (federal, State, regional, and local) and stakeholders from the private and non-profit sectors prior to finalizing this proposed program.
- On March 16, 2018, SCE invited stakeholders to a workshop to share details about SCE's CR2 plans. Over 140 participants registered, representing over 90 different private, non-profit, and public sector entities.
- In addition to the broad March 16 workshop, SCE held multiple smaller-group meetings to engage with and solicit feedback from a wide variety of stakeholders, including:
  - small and large business customers,
  - community leaders and organizations that represent the diverse customer base,
  - environmental and environmental justice advocates,
  - faith-based organizations,
  - local government officials, and
  - representatives from community choice aggregators.

# Charge Ready 2 program elements: expanded make-ready program

- **Problem Statement:**

- Substantially more charging stations are needed in SCE's territory to support the growth of EVs on a trajectory consistent with the Governor's target and SCE's analysis for 2030. SCE projects 790,000 EVs in our service territory by 2023.
- Charge Ready Pilot created good framework but additional learnings need to be incorporated into expanded program.

- **Description:**

- Leverage key learnings from Charge Ready Pilot and expand program to 32,000 make-ready ports over a new four-year program targeting workplaces, MUDs, destinations and fleets.
  - Port minimum dropped from 5 (DAC) and 10 (non-DAC) to 2 (all) ports per site
  - Eliminated parking lot size requirements – allows for curbside charging deployment
  - Included ~200 DCFC at select sites (eligibility requirements pending)
  - Added customer ownership option with up to 80% rebate (mirrors MD/HD final decision)
  - Allow for future deployment planning with site host commitment
- Address needs in low-income and disadvantaged communities, including a commitment to deploy a minimum of 30 percent of CR2 charging infrastructure in disadvantaged communities.

- **Additional Benefits:**

- Cost savings: Pre-packaged designs for sites; potential for bulk purchase discounts on infrastructure and charging stations; leverage existing construction where appropriate.
- Greater deployment in MUDs: reduced or eliminated several key barriers to MUD adoption.
- Increased access to charging: Public chargers (incl. DCFC) allow for greater access for apartment dwellers and street parkers.
- Capture diverse charging market: Increased dispersion of both Level 2 and DCFC in SCE's territory.
- Customer choice: Site hosts have greater options to serve their residents/employees/customers, as well as option to install and own make-ready infrastructure on their premises.

# Charge Ready 2 make-ready expansion and its potential impact on the market

- Many studies have identified *range anxiety as a top barrier* to EV adoption, with several facets contributing to the broader sentiment: access to public charging stations, access to home charging and vehicle battery range
- SCE's make-ready expansion program provides a continued focus on away-from-home charging at workplace and public charging locations as well as charging at MUDs, offering a *balance of workplace/public and at-home charging and supporting renewable power integration*.
- For EVs to be a true option, all customers, including those who rent their homes or live in MUDs, must have readily available charging stations. Nearly 44 percent of households in SCE's territory rent, and 36 percent of households in SCE's territory are in MUDs. Sufficient away-from-home charging stations enable EVs to be viable options for customers who do not have available residential charging options.
- SCE's Charge Ready 2 portfolio encourages customers to help California *use abundant renewable power and improve use of the electric system through TOU price signals and other load management strategies*.
  - TOU price signals and load management strategies offer lower prices for EV drivers during non-peak periods of the day in order to shift EV load to hours of the day when there is excess generation on the grid, driven by increased penetration of energy from photovoltaic solar, both large-scale and distributed.
  - At these times, load is less costly to serve, providing downward pressure on costs (and eventually rates). For active, daytime grid management to become a reality, southern California needs sufficient away-from-home charging during the day to support meaningful load shifting.

# Charge Ready 2 program elements: utility end-to-end ownership option for MUDs and government locations

- **Problem Statement:**
  - SCE's Charge Ready Pilot has had deployment challenges in MUDs and government properties.
- **Description:**
  - Matching PG&E and SDG&E program designs, SCE would provide MUDs and governmental entities with the opportunity to have turnkey solution where SCE not only installs the make-ready, but also owns and operates charging stations.
  - SCE proposes to offer a turnkey option where, in addition to the make-ready, SCE will own and operate charging stations deployed in MUDs and at governmental locations.
    - Participation capped at an estimated 4,230 charge ports (35 percent of MUD participation forecasted in the Make-Ready Expansion program).
    - Estimate of 32,000 ports includes both customer-owned ports and utility-owned-and-operated ports.
  - Billing structure options:
    - Separate service drop to avoid site host account; SCE or EVSP is customer of record; SCE TOU rate passed directly to driver.
    - Customer of Record pays SCE rate and negotiates price drivers pay (free, other).
  - Site host pays one-time participation payment (will seek TE Advisory Board input).
- **Additional Benefits:**
  - Strong stakeholder and customer support: March 16 stakeholder meeting feedback was supportive of SCE ownership similar to PG&E and SDG&E model; multiple additional meetings with feedback from small and large business customers, community leaders, environmental and environmental justice advocates, faith-based organizations, local government officials and representatives from community choice aggregators.
  - Cost savings: Potential for bulk purchase discount on infrastructure and charging stations.
  - Greater deployment in MUD: Ownership has led to a greater penetration in MUDs for SDG&E.
  - Customer flexibility: Site hosts have option for make-ready or turnkey solution.

# Turnkey deployment option for MUDs and governmental locations minimizes customer operations and maintenance responsibilities

## Lessons Learned from the Pilot

- *MUDs hesitant to invest in EV chargers.*
  - Main objective is to provide amenities that will benefit all residents. When asked for interest in spending money to provide charging stations for a subset of residents, there has been minimal interest from site hosts. For this reason in particular, offering utility ownership of the charging stations to a portion of the MUD segment would enable EV adoption for residents in those locations.
- *Governmental locations require a long lead-time for charging station procurement.*
  - Government institutions had the longest delays in moving projects forward in the Pilot. These delays directly impacted the start of construction and other downstream activities. In order to minimize delays and facilitate participation by these customers, SCE is offering governmental entities a model where SCE owns and operates the charging station in Charge Ready 2 at the customer's choosing.

# Charge Ready 2 program elements: beyond-code incentive for new MUD construction

- **Problem Statement:**

- SCE's Charge Ready Pilot is not a good fit for new construction, when it is least expensive and easiest to install EV charging infrastructure (while the ground is open).

- **Description:**

- Partner with developers of new MUD locations to expand on CalGREEN construction code that requires developers to install conduit and adequate panel locations for future EV charging.
- Program establishes code as baseline; SCE would offer an incentive to cover all or a portion of the incremental cost to install EV charging stations.
- Incentive of up to \$4,000/port, serving 16,000 ports over four years.

- **Additional Benefits:**

- Inexpensive station deployment: Proposed incentive would capture 3x-4x more stations for same spend than in a make-ready program.
- Greater deployment in MUDs: Program developed specifically for MUDs.
- Data collection: Require separate metering of stations (monitoring only).
- Customer flexibility: Developers can determine appropriate location and number of stations that best fit site (i.e., overcome limited parking availability and charging station dispersion).
- Planning/Safety: SCE plans for utility-side infrastructure when EV chargers are specified in a customer's load schedule – rebate would ensure that stations are captured and planned for.

# Broad awareness, customer education, TE advisory services and Charge Ready-specific program marketing are necessary to increase EV awareness

Intervention	Est. Annual (Total) Cost	Activities	Barrier		
			Awareness	Economics	Charging
1 EV awareness campaign	\$7.2m (\$28.7m)	• Mass media	✓		
		• Direct Marketing	✓		
		• Outreach through Local Community Orgs	✓		
		• EV Ambassadors Network	✓		
2 Customer Education Program on EV experience, economics, and charging	\$2.0m (\$8.0m)	• New, online self-service educational tools	✓	✓	✓
		• Hands-on ride-and-drives and experiential events	✓		
		• Enhanced education and training materials for OEMs, dealerships, and other stakeholders	✓	✓	✓
3 Expansion of TE Advisory Services for business customers	\$1.2m (\$4.8m)	• Educational Events at SCE’s Energy Education Centers	✓	✓	
		• Fleet Assessments and Site Feasibility Assessments		✓	✓
		• Grant Writing Services/Support		✓	
4 Charge Ready-specific program marketing and outreach	\$1.9m (\$9.7m)	• Targeted marketing and outreach specifically to potential make-ready site hosts			✓

# Market education & outreach (ME&O) tackle key adoption barriers and address customer needs.

- *EV Awareness Campaign* leveraging mass media channels, a web content refresh, and the launch of a new EV Ambassador network.
  - Scope of EV ME&O activities are on par with other successful broad efforts conducted by SCE (i.e., safety campaigns on dangerous electrical situations).
- *Customer Education Program* with new online self-service tools, ride-and-drive events, and education and training materials for industry stakeholders (e.g., dealerships, architects and developers).
  - Provide customers with information to assist in overcoming barriers to adoption, for example: understanding the total cost of ownership and finding ways to locate charging away from home.
- *TE Advisory Services Expansion* building on TE Advisory Services deployed concurrently with the Phase 1 Pilot.
  - Focus on technical education and support commercial, governmental and fleet-operating customers and targeting lessons learned from the Pilot (i.e., grant writing services/support).

# Charge Ready 2 cost detail

2018 \$							
<b>Capital Cost</b>	<b>Year 0</b>	<b>Year 1</b>	<b>Year 2</b>	<b>Year 3</b>	<b>Year 4</b>	<b>GRAND TOTAL</b>	
Utility-side Costs (make-ready)	\$ -	\$ 26,092,963	\$ 39,139,445	\$ 39,139,445	\$ 26,092,963	\$ 130,464,816	
Customer-Site Cost (make-ready)	\$ -	\$ 79,061,975	\$ 118,592,962	\$ 118,592,962	\$ 79,061,975	\$ 395,309,874	
Ownership Station Cost (incremental)	\$ -	\$ 3,231,268	\$ 4,846,902	\$ 4,846,902	\$ 3,231,268	\$ 16,156,339	
Non-labor (Capital)	\$ 1,138,750	\$ 262,500	\$ 262,500	\$ 262,500	\$ 131,250	\$ 2,057,500	
Labor (Capital)	\$ 45,855	\$ 3,398,283	\$ 5,067,324	\$ 5,073,335	\$ 3,368,183	\$ 16,952,980	
<b>Program O&amp;M</b>							
Non-labor (Expense)	\$ 125,000	\$ 75,000	\$ 75,000	\$ 75,000	\$ 200,000	\$ 550,000	
Labor (Expense)	\$ 318,011	\$ 2,012,774	\$ 2,938,994	\$ 3,116,137	\$ 2,515,574	\$ 10,901,490	
Ownership and Operation O&M	\$ -	\$ 937,736	\$ 2,423,673	\$ 3,750,944	\$ 4,688,680	\$ 11,801,034	
Rebate (L2)	\$ -	\$ 11,024,116	\$ 16,536,175	\$ 16,536,175	\$ 11,024,116	\$ 55,120,582	
Rebate (DCFC)	\$ -	\$ 1,107,865	\$ 1,661,798	\$ 1,661,798	\$ 1,107,865	\$ 5,539,326	
New Construction Rebate	\$ -	\$ 16,000,000	\$ 16,000,000	\$ 16,000,000	\$ 16,000,000	\$ 64,000,000	
CR2 Marketing Campaign (Non-Labor)	\$ 950,000	\$ 2,331,000	\$ 2,730,000	\$ 1,836,000	\$ 1,895,000	\$ 9,742,000	
<b>Market Education &amp; Outreach</b>							
ME&O	\$ -	\$ 10,505,360	\$ 9,363,840	\$ 11,304,320	\$ 10,354,300	\$ 41,527,820	
<b>TOTAL</b>	<b>\$ 2,577,616</b>	<b>\$ 156,040,840</b>	<b>\$ 219,638,612</b>	<b>\$ 222,195,518</b>	<b>\$ 159,671,175</b>	<b>\$ 760,123,761</b>	

# Appendix

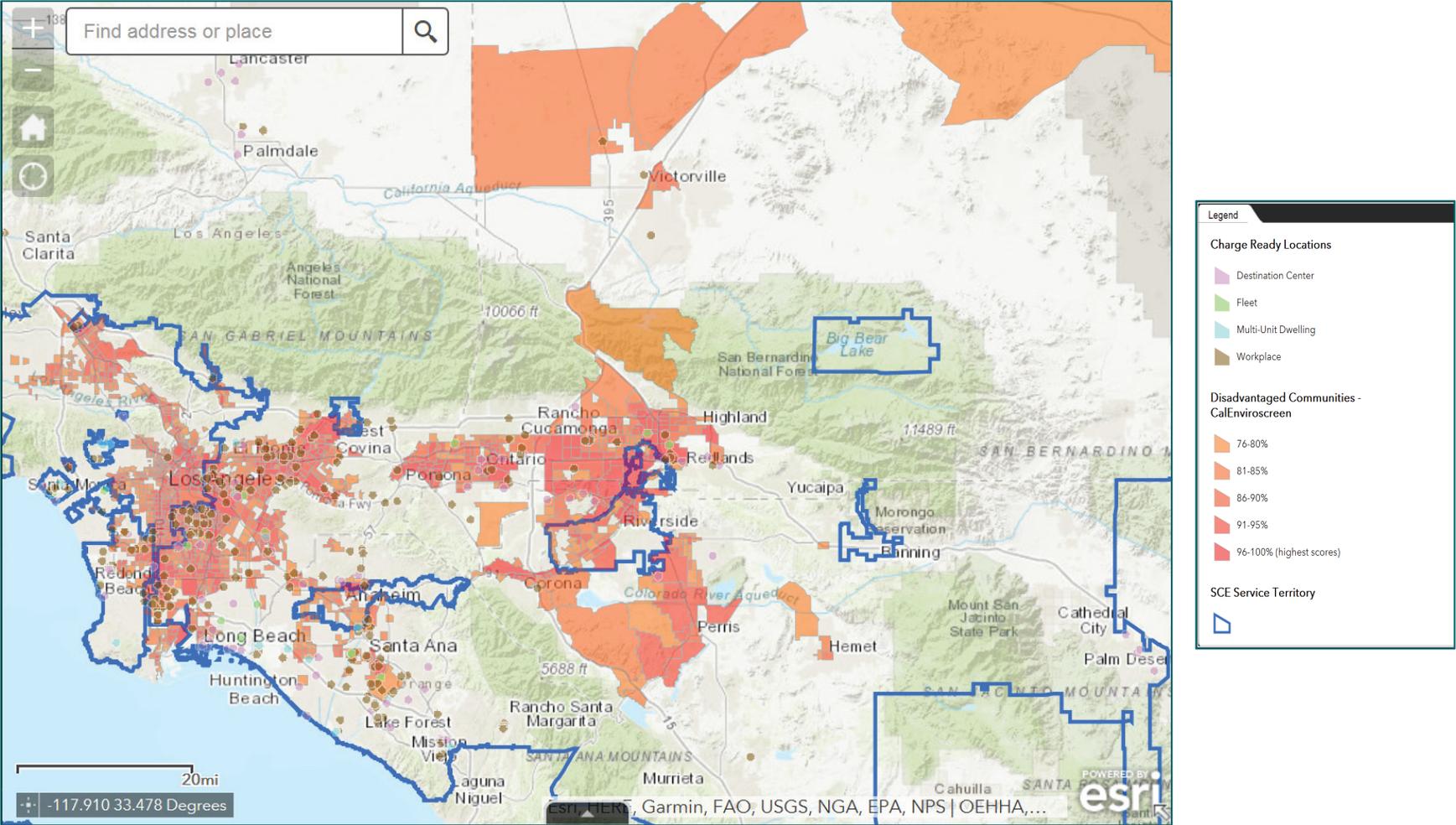
Energy for What's Ahead<sup>SM</sup>



# Charge Ready 2 Filing Outline

<b><u>Chapters 1-2</u></b> <b>Policy and Vision</b>	<b><u>Chapter 3</u></b> <b>Charge Ready 2 Portfolio</b>	<b><u>Chapter 4</u></b> <b>Satisfies Statutory and Regulatory Guidelines</b>	<b><u>Chapter 5</u></b> <b>Cost Recovery</b>
<p><b>Presents a summary of SCE vision and introduces portfolio of programs</b></p> <p>1) Introduction            2) Vision and Strategy for TE Market Transformation</p> <ul style="list-style-type: none"> <li>• Pilot success and learnings noted</li> <li>• Necessity of LD TE to achieve state climate goals</li> <li>• Additional benefits of improved air quality and lower rates</li> <li>• Market barriers needed to be addressed to accelerate EV adoption</li> </ul>	<p><b>Presents descriptions of Charge Ready 2 programs</b></p> <p>1) Infrastructure program portfolio: ~ \$718 M</p> <ul style="list-style-type: none"> <li>• Make-ready expansion</li> <li>• Own and operate option</li> <li>• New construction rebate</li> </ul> <p>2) ME&amp;O program portfolio: ~\$41M</p> <ul style="list-style-type: none"> <li>• EV awareness campaign</li> <li>• Customer education</li> <li>• TE advisory services</li> </ul> <ul style="list-style-type: none"> <li>▪ Pilot learnings</li> <li>▪ Description</li> <li>▪ Objectives</li> <li>▪ Scope and Cost</li> <li>▪ Design Elements</li> <li>▪ Timeline</li> </ul>	<p><b>Describes adherence to relevant statutory and regulatory guidelines</b></p> <p>1) Addresses multiple goals of widespread TE            2) Aligns with broader state policies            3) Promotes safety            4) Portfolio minimizes cost and maximizes benefits</p>	<p><b>Calculates the revenue requirement</b></p> <p>1) One-Way Balancing Account            2) Forecast of Revenue Requirement</p>
<p><b>Witnesses:</b> Backstrom &amp; Bowman</p>	<p><b>Witnesses:</b> Bowman &amp; Sloan Moody</p>	<p><b>Witness:</b> Backstrom</p>	<p><b>Witness:</b> Sheriff</p>

# Map of Current CR Locations<sup>1</sup>



<sup>1</sup> Map available at <https://sce2.maps.arcgis.com/apps/webappviewer/index.html?id=86c1a95d2d5b4c62a16237d7242cfc56>.

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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) NOTICE OF EX PARTE COMMUNICATION** on all parties identified on the attached service list(s) for **A.18-06-015**. 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.
- A true copy was also sent via e-mail to the following individuals at the following email addresses:

Nidhi Thaker, Chief for Strategy and External Affairs for President Michael Picker	nidhi.thakar@cpuc.ca.gov
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- Placing the copies in sealed envelopes and causing such envelopes to be delivered by US Mail to the offices of the Commissioners(s) or other addresses(s).

**ALJ Sasha Goldberg  
505 Van Ness Ave.  
San Francisco, CA 94102**

Executed this **July 19, 2018**, at Rosemead, California.

/s/ Sandra Sedano

**Sandra Sedano  
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California  
Public Utilities  
Commission



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## CALIFORNIA PUBLIC UTILITIES COMMISSION

### Service Lists

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FILER: SOUTHERN CALIFORNIA EDISON COMPANY  
LIST NAME: LIST  
LAST CHANGED: JULY 17, 2018**

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