

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

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

Application 14-10-014

**SOUTHERN CALIFORNIA EDISON COMPANY'S (U 338-E) REPLY COMMENTS  
ON PROPOSED DECISION OF ALJ GOLDBERG GRANTING SCE'S  
PETITION FOR MODIFICATION**

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Dated: **December 10, 2018**

**SOUTHERN CALIFORNIA EDISON COMPANY’S (U 338-E) REPLY COMMENTS  
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## I.

### INTRODUCTION

Pursuant to Rule 14.3(d) of the Rules of Practice and Procedure of the California Public Utilities Commission (“Commission”), Southern California Edison Company (“SCE”) hereby submits the following reply to comments on Administrative Law Judge (“ALJ”) Goldberg’s proposed decision (“PD”) granting SCE’s petition for modification (“PFM”).

## II.

### DISCUSSION

A. **Parties agree with SCE that the PD should be adopted to maintain momentum of transportation investment and ensure steady market transformation.**

SCE, California Energy Storage Alliance (“CESA”), ChargePoint, and the City of Lancaster (“Lancaster”) agreed that the PD should be adopted without any major modifications. As discussed in CESA’s Comments, “the PD ... ensures continued market transformation of EV and EVSE deployments by reducing the gap between Phase 1 and the opening of Phase 2.”<sup>1</sup> ChargePoint similarly contends that, “[a]doption of the Proposed Decision will provide greater certainty to customers and providers, and facilitates a smoother transition to Phase 2, an outcome that is consistent with California’s goal of accelerating transportation electrification and expanding electric vehicle charging infrastructure.”<sup>2</sup> SCE agrees, and respectfully urges the Commission to adopt the PD, with the minimal modifications recommended in SCE’s Opening Comments, specifically, to authorize SCE to establish a separate sub-account to record revenue requirements associated with Charge Ready bridge funding.<sup>3</sup>

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<sup>1</sup> CESA Comments, p. 1.

<sup>2</sup> ChargePoint Comments, pp. 2-3.

<sup>3</sup> SCE Comments, pp. 3-4.

**B. CalPA’s recommendations do not align with efforts to target MUDs and should be rejected.**

The Public Advocates Office (“CalPA”) supports the PD with the following modifications: First, CalPA recommends that the PD’s requirement to install at least 1,000 ports be increased to 1,266 because SCE was able to approve this number of port installations with the same budget in the Charge Ready Pilot. CalPA also recommends that if SCE does not install at least the minimum number of required ports, SCE’s costs should be subject to after-the-fact reasonableness review. Finally, CalPA recommends that the Commission require (1) a specific amount set aside for multi-unit dwelling (“MUD”) installations that corresponds to 20% installations in MUDs and that (2) any unused funds reserved for the MUDs be returned to ratepayers after the completion of SCE’s Charge Ready Phase 2.<sup>4</sup> CalPA’s recommended modifications do not align with efforts to target greater MUD adoption as described in the PD and should be rejected.

Although SCE was able to approve 1,266 ports in its Charge Ready Pilot with a \$22 million budget, only 3% of those ports were in MUDs. SCE has reported on the challenges it has experienced with respect to MUD adoption in its quarterly reports, and SCE appreciates the PD’s attention to those challenges and its recommendation for lower port minimums to encourage greater adoption. SCE supports the PD’s 20% target for MUDs and decreasing the minimum port-per-site requirement to 5 ports instead of 10 ports. SCE believes that under these conditions, SCE will be well-positioned to meet the target of installing 20% of its ports in MUDs given the 1,000-port minimum target, and to achieve this target within the \$22 million budget.

Of note, after accounting for lessons learned in the Charge Ready Pilot (Pilot) SCE made material changes to features of its Charge Ready Make-Ready Program when it developed its Charge Ready 2 proposal, including decreasing the port minimum. Based on

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<sup>4</sup> CalPA Comments, p. 4.

surveys and data collected from that Pilot, SCE made an educated decision to reduce the minimum to 2 ports per site. SCE is committed to focusing its efforts on addressing barriers to adoption in MUDs, but SCE disagrees with CalPA’s assumption that reducing the port minimum to 5 ports per site will deliver the same amount of port installations as the Charge Ready Pilot, while also achieving a higher proportion of MUD adoption. The 20% target is a material change and should be accounted for accordingly.

SCE does agree with CalPA that lowering the minimum number of ports per site in MUDs will allow SCE to test whether this increases deployment in the MUD market segment and how it affects site costs. SCE agrees to provide that data in its quarterly reports as recommended by CalPA.<sup>5</sup> However, SCE disagrees that it should be subject to after-the-fact reasonableness review if it is unable to meet the higher port installation target recommended by CalPA or the 20% MUD goal without the additional modifications SCE proposed to address these concerns in its Charge Ready 2 proposal. As such, SCE recommends that the 1,000 port minimum and 20% MUD target proposed by the PD be adopted by the Commission.

C. **The PD correctly finds that this is not the proper forum to address funding to CCAs.**

Lancaster acknowledges that “the Petition is not the appropriate procedural means by which material changes to Charge Ready should occur.”<sup>6</sup> Lancaster, however, requests that the Commission consider providing funding to CCA programs in other proceedings, such as Charge Ready 2.<sup>7</sup> As Lancaster acknowledges and the PD correctly determined, Lancaster’s comments are outside of the scope of this PFM and should be disregarded.

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<sup>5</sup> CalPA Comments, p. 5.

<sup>6</sup> Lancaster Comments, pp. 2, 5.

<sup>7</sup> Lancaster Comments, pp. 5-6.

**III.**

**CONCLUSION**

For the foregoing reasons, SCE strongly supports the PD and recommends that the Commission reject CalPA's proposed modifications and approve the PD with the minor modification proposed by SCE in its opening comments.

Respectfully submitted,

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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 PROPOSED DECISION OF ALJ GOLDBERG GRANTING SCE'S PETITION FOR MODIFICATION** on all parties identified on the attached service list(s) for **A.14-10-014**. Service was effected by one or more means indicated below:

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

**ALJ Sasha Goldberg  
CPUC  
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Executed this day **December 10, 2018**, at Rosemead, California.

/s/ Sandra Sedano  
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