

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



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Order Instituting Rulemaking on the Commission's own motion to consider alternative-fueled vehicle tariffs, infrastructure and policies to support California's greenhouse gas emissions reduction goals.

Rulemaking 09-08-009

(Filed August 20, 2009)

COMMENTS OF THE GREENLINING INSTITUTE

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September 14, 2010

COMMENTS OF THE GREENLINING INSTITUTE

The Greenlining Institute (“Greenlining”) provides comments in response to the Workshop Paper regarding “The Utility Role in Supporting Plug-In Electric Vehicle Charging” (“Workshop Paper”).

Greenlining Supports Single Metering in the Near Term.

Greenlining understands that plug-in electric vehicles (PEV) provide great benefits to California climate change goals. Greenlining supports the efforts of the state of California and the California Public Utilities Commission (“the Commission”) as they ready the electric infrastructure for PEVs. Greenlining agrees that PEVs are the future of individual transportation and in the future, consideration should be given for various metering arrangements that may provide additional benefits to PEV owners. However, in the near-term, Greenlining supports the Workshop Paper’s recommendation that the single metering arrangement should be encouraged. This is the most cost-effective option in terms of impacts to ratepayers, including low-income and middle-income ratepayers who struggle to pay bills and will likely face additional rate increases independent of PEV infrastructure issues.

PEVs are cost prohibitive for many customers right now. The lowest priced electric vehicles will be over \$30,000.00. Greenlining believes that early adopters of PEVs should establish the market for these vehicles, and the necessary infrastructure, before utility ratepayers invest excessively for the infrastructure development. These early adopters, willing to make a large investment in a PEV, will be more able to absorb additional costs of developing various metering infrastructures, especially submetering arrangements. The early adopters will still be able to enjoy many benefits from PEV

ownership even under a single metering arrangement, the most significant benefit being replacement of gasoline expenses with more affordable electric service.

Utility flexibility towards other metering arrangements is warranted.

Utility policy towards PEVs and infrastructure issues should be positive but cautious. Utilities should be flexible and responsive to the growing role of PEVs, allowing early adopters of PEVs to explore and establish best practices in terms of metering arrangements for PEVs and measuring PEV load for low carbon fuel standard (LCFS) credits. These early adopters will need to bear the costs for those arrangements that occur on the consumer side of the single meter. Thus, these early adopters will act as a pilot program for PEV integration with the electric infrastructure.

In the short-term, while utility ratepayers should not bear the costs of these flexible metering arrangements, the utilities should be flexible enough to allow individual PEV owners to bear the costs to explore other arrangements, such as consumer ownership of a submeter. The Commission or the utilities can research the innovations early adopters utilize to measure PEV load separately or to establish low carbon fuel standard measurements, while keeping the costs of this exploration for the most part within this group of customers, rather than passing them on to the public at large. The cost of these innovations will be only incremental to the more significant cost of a PEV, and as such Greenlining believes that keeping these costs within the early adopter pool will not impede the development of the PEV market. As the market expands and the technology evolves, the costs of PEVs will come down and PEVs will become more ubiquitous throughout California.

Conclusion

Greenlining agrees that in the future, polluting gasoline-powered vehicle will be generally replaced by alternative-fueled vehicles, most especially PEVS, which provide great societal benefits. California's utility infrastructure should support the innovations that are required to allow the technology to grow. The Commission and California's utilities should approach the development of PEV infrastructure with the following frame of mind: encouraging early adoption by those who can afford it and accommodating the needs of the technology without passing on the costs to consumers who cannot afford PEVs.

The Commission and utilities should also maintain a long-term focus on developing and expanding the market so that PEVs becomes available to more moderate income customers as quickly as possible.

Respectfully submitted,

Dated: September 14, 2010

/s/ Enrique Gallardo
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CERTIFICATE OF SERVICE

I, Enrique Gallardo, am 18 years of age or older and a non-party to the within proceeding. I hereby certify that I have this day served a copy of

COMMENTS OF THE GREENLINING INSTITUTE

on all known parties to Rulemaking 09-08-009 by transmitting an e-mail message with the document attached to each party named in the official service list and by faxing or mailing a properly addressed copy by first-class mail with postage prepaid to those whose e-mail address is not available.

I certify that the foregoing is true and correct.

Executed in Berkeley, California on September 14, 2010.

/s/ Enrique Gallardo
Enrique Gallardo

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