



BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

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Order Instituting Rulemaking to Consider  
Alternative-Fueled Vehicle Programs,  
Tariffs, and Policies.

Rulemaking 13-11-007  
(Filed November 14, 2013)

**OPENING COMMENTS OF THE CENTER FOR SUSTAINABLE ENERGY®  
TO THE AMENDED SCOPING MEMO AND RULING OF THE ASSIGNED  
COMMISSIONER AND ADMINISTRATIVE LAW JUDGE**

**Center for Sustainable Energy®**

**May 18, 2016**

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**I. INTRODUCTION**

The Center for Sustainable Energy® (CSE) is pleased to provide these opening comments in response to the California Public Utilities Commission (Commission) regarding the *Amended Scoping Memo and Ruling of the Assigned Commissioner and Administrative Law Judge* (Amended Scoping Memo and Ruling). As a mission-driven nonprofit organization, CSE is committed to accelerating the transition to a sustainable world powered by clean energy, including the diversification of transportation technologies focused on air quality improvements and greenhouse gas (GHG) emissions reductions.

Senate Bill (SB) 350 (Stats. 2015; ch. 547) redefines Transportation Electrification (TE),<sup>1</sup> defines widespread TE as a renewable energy resource,<sup>2</sup> and establishes provisions through which utilities can be evaluated for expanded roles in TE.<sup>3</sup>

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<sup>1</sup> Public Utilities Code Section 237.5 states: “Transportation electrification” means the use of electricity from external sources of electrical power, including the electrical grid, for all or part of vehicles, vessels, trains, boats, or other equipment that are mobile sources of air pollution and greenhouse gases and the

CSE applauds the Commission for its broad and rapid response to SB 350 implementation, as well as its goal to expeditiously lay the groundwork for directing the electrical corporations to file TE program and investment applications in the third quarter of 2016.<sup>4</sup> Moreover, CSE finds that the Commission's *SB 350 Transportation Electrification Application Guidance Straw Proposal* (Straw Proposal) emphasizes many important principles and is relatively comprehensive and integrative, with explicit coordination across a variety of related activities, policies, and agencies in pursuit of SB 350 directives. Accordingly, CSE provides the following recommendations where it finds areas warranting modification in the scope of this rulemaking.

**II. TO BETTER ALIGN WITH THE MANDATES OF SB 350, THE STRAW PROPOSAL SHOULD ADOPT A CORE PRINCIPLE THAT ENCOURAGES TRANSPARENCY AND INFORMATION SHARING.**

To better align with the mandates of SB 350, CSE recommends that an additional core principle encouraging program transparency and shared learning should be adopted and added as an explicit requirement for the electrical corporations' TE program and investment applications. To inform and develop a competitive marketplace and to maximize learning from the TE technology deployed in these applications, anonymous and aggregated data from

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related programs and charging and propulsion infrastructure investments to enable and encourage this use of electricity.

<sup>2</sup> Public Utilities Code Section 701.1(a)(1) states: "The Legislature finds and declares that, in addition to other ratepayer protection objectives, a principal goal of electric and natural gas utilities' resource planning and investment shall be to minimize the cost to society of the reliable energy services that are provided by natural gas and electricity, and to improve the environment and to encourage the diversity of energy sources through improvements in energy efficiency, development of renewable energy resources, such as wind, solar, biomass, and geothermal energy, and widespread transportation electrification.

<sup>3</sup> Public Utilities Code Section 740.12(b) states: "The Commission... shall direct electrical corporations to file applications for programs and investments to accelerate widespread transportation electrification...."

<sup>4</sup> *Amended Scoping Memo and Ruling of the Assigned Commissioner and Administrative Law Judge*, March 30, 2016; Page 22.

all programs should be made publicly available, easily accessible, and distributed as openly and widely as possible (while ensuring ratepayer confidentiality and privacy). This type of data sharing and transparency informs program evaluation and improvement, market characterizations, and strategic decision-making throughout the TE ecosystem. CSE can attest to the value of such data, as we are administrators of the Clean Vehicle Rebate Project (CVRP) Rebate Statistics website<sup>5</sup> and EV Consumer Survey Dashboard,<sup>6</sup> which are regularly utilized by a variety of stakeholders for various purposes and assist in a wide range of decision-making processes. As such, CSE urges the Commission to adopt a core principle to promote program transparency and information sharing and require the electrical corporations' TE program and investment applications to include program transparency and data-sharing components.

### **III. STANDARDS DEVELOPMENT, RESEARCH AND DEVELOPMENT, AND PILOT PROJECTS SHOULD PROMOTE COMMUNICATION STANDARDS AND VEHICLE-GRID INTEGRATION (VGI)**

From CSE's perspective, building in standards for TE infrastructure fundamentally encourages "smart charging". As a flexible resource, electric vehicles have significant potential to support California's changing electricity grid through VGI. Accordingly, CSE recommends that the Commission prioritize a portfolio that includes forward-thinking programs that enable VGI and lay the groundwork for a smart-grid future facilitated by standards and investments now with longer-term, transformational benefits. Building in VGI standards for TE infrastructure will likely prove to be an effective tactic to avoid future costs

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<sup>5</sup> Center for Sustainable Energy (2016). California Air Resources Board Clean Vehicle Rebate Project, Rebate Statistics. Data last updated May 02, 2016. Retrieved [5/9/2016] from <https://cleanvehiclerebate.org/eng/rebate-statistics>

<sup>6</sup> Center for Sustainable Energy (2016). California Air Resources Board Clean Vehicle Rebate Project, EV Consumer Survey Dashboard. Retrieved [5/9/2016] from <https://cleanvehiclerebate.org/eng/survey-dashboard/ev>

and/or negative impacts to ratepayers caused by potential stranded assets or investments that require retrofitting.

Moreover, CSE recognizes that various VGI standards act on different endpoints within the TE ecosystem and thus could potentially provide different benefits to consumers and the grid. Therefore, CSE recommends that the Commission actively gather additional information on implementation of each VGI standard in order to appropriately guide the adoption of either a single standard or set of standards for preferred use in the California. Accordingly, CSE recommends that the Commission evaluate the proposed TE programs based on, but not limited to, the program's ability to:

- React to dynamic pricing to encourage charging during optimal periods for the grid (thus reducing consumer costs);
- Allow for power level variation;
- Be easy-to-use by consumers and not pose unreasonable burden on the consumer when selecting when to charge;
- Protect proprietary consumer, utility and OEM information; and
- Allow for communication and aggregation in the wholesale market.

Broadly speaking, infrastructure that has these capabilities can enable smarter grid communication and control strategies, which provide valuable benefits to an increasingly renewables-based grid. As such, CSE recommends that the Commission continue to investigate and understand VGI communication standards through pilot programs and evaluate programs based on their VGI capability.

#### **IV. CONCLUSION**

CSE appreciates the opportunity to provide these opening comments regarding the Amended Scoping Memo and Ruling. CSE strongly supports the Commission's SB 350 rulemaking

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initiatives and appreciates the Commission's leadership. Efforts such as these strongly align with the Governor's Executive B.16-12,<sup>7</sup> the State's 50/50/50 goals as codified in SB 350, the ZEV Action Plan, and SB 1275.

May 18, 2016

A handwritten signature in black ink, appearing to read "Sachu Constantine". The signature is stylized and cursive.

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