



FILED
6-01-16
04:59 PM

**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)

**SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT STAFF'S REPLY
COMMENTS IN RESPONSE TO AMENDED SCOPING MEMO AND RULING OF
THE ASSIGNED COMMISSIONER AND ADMINISTRATIVE LAW JUDGE**

Wayne Nastri
Acting Executive Officer
South Coast Air Quality
Management District
21865 Copley Drive
Diamond Bar, CA 91765-0940
(909) 396-2100
wnastri@aqmd.gov

Dated: **May 31, 2016**

**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)

**SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT STAFF'S REPLY
COMMENTS IN RESPONSE TO AMENDED SCOPING MEMO AND RULING OF THE
ASSIGNED COMMISSIONER AND ADMINISTRATIVE LAW JUDGE**

I. INTRODUCTION

Pursuant to the Rules of Practice and Procedure of the California Public Utilities Commission and pursuant to the Amended Scoping Memo and Ruling of the Assigned Commissioner and Administrative Law Judge (Scoping Memo) dated March 30, 2016, South Coast Air Quality Management District (SCAQMD) staff appreciates the opportunity to provide comments pursuant to the above-captioned OIR and submits the following in response to 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.

II. DISCUSSION

A. The SCAQMD agrees with Parties that not only call for expeditious deployment

of light duty electric vehicles (EVs), but also for medium- and heavy-duty EVs such as buses and trucks, and fully supports near-term large scale infrastructure projects

As discussed in SCAQMD staff's opening comments, SCAQMD staff would also like to emphasize that, while electrification of light-duty vehicles will provide significant air quality benefits, medium and heavy-duty vehicles are the largest sources of NOx emissions and must be a key part of our region's air quality strategy. Therefore, SCAQMD staff supports expanding utilities' contributions to accelerate Transportation Electrification (TE) and encourages the Commission to disregard TURN's recommendation that utility involvement be more limited. Specifically, TURN argues, "[r]atepayer-funded programs for widespread infrastructure ... are inappropriate for the [medium-duty and heavy-duty] MHD/HD segment," and recommends that "[t]he Commission should direct the utilities to file applications focused primarily on programs that do not involve capital investments using ratepayer funds."¹ SCAQMD staff believes that this approach may be counterproductive to the goal of concerted and expeditious planning and action by utilities needed to create charging infrastructure for trucks, and to spur their deployment. PUC policies should continue to balance potential risks to the ratepayers with needs of the state, and specifically the South Coast Air Basin, in reducing criteria and greenhouse gas air pollution, by expeditiously deploying light-, medium- and heavy-duty vehicles, as well as support utility efforts to provide funding for charging infrastructure for both passenger and freight vehicles. Further TURN indicates that "ICF/E3 Phase 3-Part A report states that medium duty (MD) and heavy duty (HD) trucks with long haul routes will be particularly difficult to electrify due to lack of development, higher costs, and logistical concerns, in contrast to light heavy duty vehicles (LHD)".² SCAQMD staff agrees that "long haul routes" may not be serviced by heavy-duty EVs in the near term; however, drayage, short, and regional haul vehicles are pre-commercial technologies that may be fully deployed over the next few years. Numerous OEMs, including Proterra, New Flyer, BYD, Volvo, Kenworth,

¹ See: TURN Comments at p. 3.

² See: TURN Comments at p. 3.

Peterbilt, and others, already have commercial or demonstration medium- and heavy-duty buses and trucks available and in use.

B. . The SCAQMD agrees with Parties that call for market education and outreach, and believes utilities are best positioned for these efforts

SCAQMD staff believes education and outreach regarding needs for, and potential benefits of, electric vehicles will be key to broad deployment. Again, utilities are also uniquely positioned to communicate such information.

III. CONCLUSION

SCAQMD staff appreciates the opportunity to submit this reply to parties' comments on the Scoping Memo, and looks forward to continuing to work with the Commission and other stakeholders in establishing policies that overcome regulatory barriers and encourage electric utilities to play a significantly greater role in supporting the deployment of electric vehicles—including those used in passenger and in freight transport. If you have any questions or comments regarding the above, please feel free to contact me at 909.396.2100 or via email at wnastri@aqmd.gov.

Dated: May 31, 2016

Respectfully submitted,

/s/ Wayne Nastri
Acting Executive Officer

21865 Copley Drive
Diamond Bar, CA 91765
909.396.2100
wnastri@aqmd.gov