

Docket: : A.17-01-020, et al.
Exhibit Number : _____
Commissioner : Peterman
Admin. Law Judges : Wong, Cooke,
: Goldberg
ORA Project : Rick Tse
Coordinator



ORA
OFFICE OF RATEPAYER ADVOCATES



**OFFICE OF RATEPAYER ADVOCATES
CALIFORNIA PUBLIC UTILITIES COMMISSION**

**PREPARED REBUTTAL TESTIMONY
ON PACIFIC GAS AND ELECTRIC COMPANY'S
AND SOUTHERN CALIFORNIA EDISON COMPANY'S
MEDIUM/HEAVY-DUTY FLEET CHARGING INFRASTRUCTURE**

San Francisco, California
September 5, 2017

TABLE OF CONTENTS

	<u>Page</u>
I. INTRODUCTION	1
CHAPTER 1:- PG&E’S FLEET-READY PROGRAM.....	1-1
I. SUMMARY OF RECOMMENDATIONS	1-1
II. DISCUSSION.....	1-1
A. ORA Recommends That The Commission Adopt A One-Year Phased Pilot For PG&E’s Fleet-Ready Program.	1-1
B. PG&E Should Develop A Commercial EV Charging Rate To Complement Its Proposed Fleet-Ready Program.	1-3
C. ORA Recommends That The Utilities Prioritize TE Investments In Disadvantaged Communities.....	1-4
III. CONCLUSION	1-5
CHAPTER 2: SCE’S MEDIUM/HEAVY-DUTY CHARGING.....	2-1
INFRASTRUCTURE PROGRAM	2-1
I. SUMMARY OF RECOMMENDATIONS	2-1
II. DISCUSSION.....	2-1
A. The Commission Should Only Approve A Phased Pilot To Ensure The Lessons Learned From This Smaller Scale Pilot Can Be Applied When SCE Deploys The Full-Scale MD/HD Program.	2-1
B. The Green Power Institute’s Proposal for a 10% Education and Outreach Budget Should Be Rejected, and SCE Should Further Define the Scope and Budget with Assistance from Fleet Owner Stakeholder Groups and Marketing Professionals.	2-2
C. The Accurate Definition of Stranded Assets Should be Clarified.....	2-3
III. CONCLUSION	2-4
APPENDIX A – QUALIFICATIONS OF WITNESSES	

1 **I. INTRODUCTION**

2 This rebuttal testimony was prepared by the Office of Ratepayer Advocates (“ORA”) of
3 the California Public Utilities Commission (“Commission”) in Application (“A.”) 17-01-020
4 (Pacific Gas and Electric Company (“PG&E”)) and A.17-01-021 (Southern California Edison
5 Company (“SCE”)). In this proceeding, the applicants request Commission approval to
6 implement medium/heavy-duty (“MD/HD”) fleet charging infrastructure and commercial electric
7 vehicle rates programs pursuant to Senate Bill 350 (“SB 350”). ORA’s rebuttal testimony
8 responds to various parties’ recommendations associated with the applicants’ requests.

9 Rick Tse served as ORA’s project coordinator and is responsible for the overall
10 coordination and preparation of this testimony. Tom Gariffo and Rick Tse served as ORA’s
11 witnesses and are responsible for different chapters of this rebuttal testimony, and their prepared
12 qualifications and testimony are contained in Appendix A of this report. ORA’s legal counsel
13 for this proceeding is Tovah Trimming.

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15

List of ORA Witnesses and Respective Chapters

Chapter Number	Description	Witness
1	PG&E’s Fleet-Ready Program	Rick Tse
2	SCE’s MD/HD Charging Infrastructure Program	Tom Gariffo

1 **Chapter 1:- PG&E’S FLEET-READY PROGRAM**

2 **I. SUMMARY OF RECOMMENDATIONS**

3 ORA conducted an in-depth review and analysis of parties’ opening testimonies and
4 provides the following comments:

- 5 • ORA recommends that the Commission adopt a one-year pilot
6 for PG&E’s Fleet-Ready Program rather than the extended four-
7 year pilot suggested by The Utility Reform Network.
- 8 • ORA recommends that PG&E develop a commercial electric
9 vehicle charging rate to complement its proposed Fleet-Ready
10 Program, as proposed by multiple parties.
- 11 • ORA recommends that the utilities prioritize transportation
12 electrification investments in disadvantaged communities in
13 support of the joint testimony of the Union of Concerned
14 Scientists, East Yard Communities for Environmental Justice,
15 and Center for Community Action and Environmental Justice.

16 **II. DISCUSSION**

17 **A. ORA Recommends That The Commission Adopt A One-**
18 **Year Phased Pilot For PG&E’s Fleet-Ready Program.**

19 The Utility Reform Network’s (“TURN”) opening testimony recommends that the
20 Commission reduce PG&E’s and SCE’s program budget requests to \$81 million (“M”) each
21 from \$210.8M and \$553.8M, respectively, and authorize a four-year Phase 1 pilot instead of the
22 five-year programs proposed by the utilities.¹ TURN contends that commercial MD/HD electric
23 vehicles (“EVs”) generally require longer lead times to manufacture and procure, and gather data
24 from pilot implementation.² Similar to TURN, ORA’s opening testimony recommends that the
25 Commission approve both utilities’ programs as a phased pilot. However, ORA recommends
26 that only 10% of the utilities’ proposed budget requests (\$21.0M for PG&E and \$55.4M for
27 SCE) be approved and that Phase 1 for each program be for a duration of only one year.³

¹ TURN Prepared Testimony Addressing the Proposals of Pacific Gas and Electric Company and Southern California Edison for Non-light-duty Charging Station Infrastructure Programs, p. 18, lines 3-7 (hereinafter “TURN MD/HD Testimony”).

² TURN MD/HD Testimony, p. 18, lines 35-37.

³ ORA Prepared Testimony on Pacific Gas and Electric Company’s and Southern California Edison Company’s Medium/heavy-duty Fleet Charging Infrastructure and Commercial Electric Vehicle Rates Programs, p. 3, lines 3-7 and 16-21 (hereinafter “ORA MD/HD Testimony”).

1 ORA strongly supports the state’s goal of increasing EV adoption to reduce greenhouse
2 gas emissions and air pollution; however, the utilities’ proposals to spend \$553.8 M (SCE) and
3 \$210.8 M (PG&E) ratepayer dollars in a nascent and evolving market is excessive and presents
4 an unnecessary risk to ratepayers. Accordingly, ORA agrees with TURN that the utilities should
5 use a phased pilot approach to test market viability and generate information prior to a full-scale
6 rollout. This approach minimizes ratepayer risk and better ensures program success.

7 Phase 1 of ORA’s proposed MD/HD phased pilot program does not need to be for a
8 duration of four years, as recommended by TURN. ORA recognizes the longer lead time to
9 procure commercial EVs, such as transit buses, and understands that transit agencies typically
10 phase in their vehicle purchases over several years.⁴ However, a pilot that involves a small
11 number of MD/HD vehicles, as proposed by ORA, would not require the same long lead time
12 that transit agencies typically face when they replace their vehicle fleet wholesale at the end-of-
13 service life. Further, as part of implementing a pilot program, the utilities should work with
14 public transit agencies and/or school districts, which PG&E identified as “beachhead”⁵ sectors,
15 where vehicles are commercially and readily available such that the lead time should not be a
16 concern that would warrant a longer pilot duration.

17 Finally, ORA notes in its opening testimony that three of PG&E’s proposed priority-
18 review projects (“PRPs”) – the Electric School Bus Pilot, the MD/HD Fleet, and the Idle-
19 Reduction Demo – already target the same MD/HD market segment.⁶ If approved, these PRPs
20 also would be able to generate data to inform the utilities’ fleet charging programs. Since these
21 one-year PRPs are presumed to be approved and rolled-out well before the fleet charging
22 programs,⁷ some data from these pilots will be available to inform Phase 2 if, in fact, Phase 1 is
23 delayed due to longer procurement time. In essence, ORA’s recommendation for a one-year
24 pilot for the fleet charging programs is akin to the utilities’ proposed PRPs, specifically PG&E’s

⁴ SCE Testimony, p. 58, lines 16-17.

⁵ PG&E Testimony, p. 3-33, lines 5-6 and p. 3-34, lines 13-19; PG&E defines “beachhead” sectors as sectors where EV development are likely to promulgate further EV innovation and accelerated deployment. PG&E identifies “beachhead” sectors based on several factors, including vehicle availability, operational characteristics, and vehicle and operating costs, etc.

⁶ ORA MD/HD Testimony, p. 1-4, lines 20-21.

⁷ Per the September 14, 2016 Assigned Commissioner’s Ruling, p. 31 (explaining that priority-review projects that are non-controversial in nature, and limited to no more than \$4 million in costs per project will be expedited under a fast track review process).

1 MD/HD Fleet Demo and SCE’s Electric Transit Bus Make-Ready Pilot, where the utilities are
2 testing fleet charging in a short-term, one-year duration. Therefore, there is no reason why the
3 utilities cannot implement a one-year pilot for their fleet charging programs. ORA’s proposed
4 one-year duration includes one year of operation following the infrastructure design and
5 construction phase similar to PG&E’s proposed PRPs.⁸

6 The utilities’ fleet charging programs warrant a cautious approach in order to minimize
7 ratepayers risk and ensure greater program success. Therefore, ORA recommends that the
8 Commission adopt a phased approach for both utilities’ programs. Further, as explained above,
9 TURN’s recommended four-year pilot timeline is not applicable to ORA’s proposed pilot
10 programs because the size and scope of ORA’s proposed pilot would include a smaller number
11 of vehicles, some from beachhead sectors, operating in their normal duty cycles. Accordingly,
12 the Commission should not authorize a four-year duration with ORA’s recommended pilot.

13 **B. PG&E Should Develop A Commercial EV Charging Rate To**
14 **Complement Its Proposed Fleet-Ready Program.**

15 ORA supports the joint testimony of Natural Resources Defense Council, Greenlining
16 Institute, Plug In America, Coalition of California Utility Employees, Sierra Club, and the
17 Environmental Defense Fund (“Joint Parties”) regarding their recommendation that PG&E
18 commit to a timeframe for proposing optimized rates for commercial, public, and direct current
19 fast charging.² As ORA stated in its opening testimony, the lack of a charging rate incentive
20 exposes ratepayers to the risk of stranded assets.¹⁰ In particular, customers with fleets that are
21 largely inelastic to charging times may be exposed to significant demand charges and may
22 ultimately curtail, if not completely forgo, their EV fleet operation due to economics. Since
23 PG&E did not propose any rate incentives or load management solutions¹¹ as it did for its PRPs,
24 the possibility of this occurring is very real.

⁸ See PG&E Testimony, p. 2-7, Table 2-2, line item No. 2.

² Joint Testimony of Natural Resources Defense Council, Greenlining Institute, Plug In America, Coalition of California Utility Employees, Sierra Club, and the Environmental Defense Fund (hereinafter “Joint Parties MD/HD Testimony”), p. 2, lines 1-6.

¹⁰ ORA MD/HD Testimony, p. 1-3, lines 13-14.

¹¹ PG&E proposes to utilize technology solutions, such as load management software and onsite battery storage in two of its three priority-review projects (MD/HD Fleet, and Idle-Reduction Demo), to avoid costly demand charges and lower charging costs to customers.

1 San Diego Airport Parking Company’s (“SDAP”) opening testimony provides a real
2 example of a transit agency whose bus fleet has a fixed in-service duty cycle and whose charging
3 cannot be shifted to avoid costly demand charges. SDAP’s own fleet’s use cases (comprised of a
4 small fleet of shuttle buses) identify the limitations that it has scheduling charging and mitigating
5 demand charges.¹² SDAP presents its use cases and compares its fleet’s cost-per-mile charging
6 using SDG&E’s rates. SDAP concludes that for a small commercial fleet at 240,000 miles per
7 year, such as itself, a two-cent increase in electricity cost-per-mile would double the operational
8 cost per year, from \$4,800 to \$9,600.¹³ SDAP recommends that the Commission order all
9 utilities to develop an EV charging rate to complement each fleet application (small, medium,
10 and large fleets) to minimize the cost-per-mile, and ultimately reduce the operational cost of
11 adopting an EV fleet.¹⁴

12 For entities like SDAP, adopting an EV fleet without complementary rate incentives may
13 cause their operational costs to skyrocket. The possibility that participants could default as a
14 result of increasing operational costs, and thus create stranded assets, is a real concern.
15 Therefore, ORA concurs with Joint Parties’ testimony that PG&E should follow SCE’s example
16 and develop a commercial EV charging rate.¹⁵ Although PG&E states that it is developing
17 changes to demand charges and time-of-use periods for commercial customers in its 2017
18 General Rate Case Phase II,¹⁶ PG&E should ensure that proposes rate structures that can take
19 effect when it implements its TE programs, particularly its PRPs. Doing so would ensure the
20 data it gathers from these programs will include the impact of rate incentives and, therefore, be
21 useful and informative to its MD/HD standard review program.

22 **C. ORA Recommends That The Utilities Prioritize TE**
23 **Investments In Disadvantaged Communities.**

24 ORA responds to the joint testimony of Union of Concerned Scientists (“UCS”), CCAEJ,
25 and East Yard Communities for Environmental Justice (“EYCEJ”) (collectively

¹² San Diego Airport Parking Company Testimony on Commercial Fleet Charging and EV Rates (hereinafter “SDAP Testimony”), pp. 5-7.

¹³ SDAP Opening Testimony on Commercial Fleet Charging and EV Rates, p. 11 (hereinafter “SDAP MD/HD Testimony”).

¹⁴ SDAP MD/HD Testimony, p. 10, lines 21-27.

¹⁵ Joint Parties MD/HD Testimony, p. 2, lines 1-6.

¹⁶ PG&E Testimony, Chapter 1, Attachment A, p. 3, lines 4-9.

1 “UCS/CCAIEJ/EYCEJ”) in support of their recommendation for the utilities to prioritize their TE
2 investments in disadvantaged communities (“DACs”) identified by the CalEnviroScreen.¹⁷ ORA
3 agrees that DACs “bear the brunt of the burden associated with pollution from the freight
4 sector.”¹⁸ For example, many heavily trafficked freight corridors run through Southern
5 California’s DACs, as identified by CalEnviroScreen 3.0.¹⁹ As ORA’s opening testimony states,
6 “DACs also surround the ports of Los Angeles and Long Beach, which together make up one of
7 the busiest sites for shipping and warehousing in the country”.²⁰ UCS/CCAIEJ/EYCEJ’s opening
8 testimony provides many examples of home, school, and community centers in Riverside and
9 San Bernardino counties that are near warehouses or freight corridors and that are most impacted
10 by pollution from these activities. For example, the testimony cites the City of San Bernardino
11 as home to Burlington Northern Santa Fe Railway’s intermodal facility.²¹ The facility serves as
12 a shipping hub for the ports of Los Angeles and Long Beach, where trucks and trains receive
13 goods from around the world and deliver them across the country. “The trucks and locomotives
14 that serve the facility produce diesel pollution and contribute to poor health in the community.”²²
15 For these reasons, ORA strongly agrees that the utilities should prioritize TE investments in
16 DACs. Accordingly, ORA’s opening testimony recommended that the Commission require
17 25%²³ and 10%²⁴ investment targets in DACs for PG&E and SCE, respectively.

18 **III. CONCLUSION**

19 In conclusion, ORA recommends that the Commission:

- 20 • Adopt ORA’s recommended one-year Phase 1 proposal for PG&E’s
21 Fleet-Ready program;

¹⁷ UCS,/CCAIEJ/ EYCEJ Opening Testimony on Medium Duty and Heavy-Duty and Fleet Charging Infrastructure and Commercial EV Rates, p. 26, lines 1-21 (hereinafter “UCS,/CCAIEJ/ EYCEJ MD/HD Testimony”).

¹⁸ UCS,/CCAIEJ,/EYCEJ MD/HD Testimony, p. 26, lines 3-4.

¹⁹ SCE Testimony, p. 13.

²⁰ ORA MD/HD Testimony, p. 2-7, lines 5-7.

²¹ UCS/CCAIEJ/EYCEJ MD/HD Testimony, p. 29, lines 10-25.

²² UCS/CCAIEJ/EYCEJ MD/HD Testimony, p. 29, lines 20-21.

²³ The recommended 25% is consistent with PG&E’s estimate that is representative of its customer base located in DACs.

²⁴ The recommended 10% is consistent with the programmatic structure adopted in SCE’s Charge-Ready Pilot Program (D.16-01-023, p. 39).

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- Require PG&E to develop commercial EV charging rates in time for the implementation of its Fleet-Ready Program; and
- Require a minimum 25% and 10% investment targets in DACs for PG&E and SCE, respectively.

1 enable the utilities to gain real-world data and experience before approving full-scale, high cost,
2 and high risk TE projects. Establishing a proper foothold for deploying TE infrastructure will
3 ultimately save time and money because lessons learned from smaller scale pilots, as proposed
4 by ORA, can be applied when deploying full-scale programs. It is for this reason that ORA in its
5 opening testimony recommended that a \$55 million Phase 1 precede a much larger program for
6 TE expansion.

7 **B. The Green Power Institute’s Proposal for a 10% Education**
8 **and Outreach Budget Should Be Rejected, and SCE Should**
9 **Further Define the Scope and Budget with Assistance from**
10 **Fleet Owner Stakeholder Groups and Marketing Professionals.**

11 In their joint opening testimony, the Green Power Institute and the Community
12 Environmental Council (collectively “GPI/CEC”) recommend that at least 10% of SCE’s
13 program budget be allocated to education and outreach (“E&O”).²⁸ GPI/CEC maintain that this
14 funding level for E&O will be beneficial both “because there are fewer EV options available at
15 this juncture” and “there are also fewer consumers in this space than in the residential/light-duty
16 market.”²⁹ This is a departure from the stance that SCE took on E&O in its testimony, asserting
17 that current E&O being performed through the Charge Ready Pilot Program (“CRPP”) is already
18 at a sufficient level of publicity.³⁰ Furthermore, SCE has demonstrated in CRPP advisory board
19 meetings that it is fully capable of performing targeted outreach to customer groups in its service
20 territory with its existing resources.³¹

21 At the size of SCE’s program, GPI/CEC’s recommendation would result in over \$55
22 million devoted to E&O, and even at the size of the Phase 1 Pilot program recommended in

²⁷ TURN cites PG&E’s Testimony p. 3-30 stating that “the costs for the FleetReady make-ready infrastructure project are highly uncertain, due to both the nascent status of market demand for non-light-duty EVs, and the uncertainty regarding the precise mix of non-light-duty vehicles and infrastructure site that will need make-ready infrastructure.” In addition, TURN cites data request TURN-SCE-01, question 4 stating that “vehicle composition and resulting GHG and pollutant reductions will vary by customer composition and participation, which will be influenced by several variables out of SCE’s control.”

²⁸ GPI/CEC Opening Testimony on Medium/Heavy-Duty and Fleet Charging Infrastructure and Rates Proposals by Pacific Gas and Electric and Southern California Edison, p. 13 (hereinafter “GPI/CEC MD/HD Testimony”).

²⁹ GPI/CEC MD/HD Testimony, p. 13.

³⁰ SCE Testimony, p. 29 (“SCE’s proposed TE portfolio, coupled with its EV rate proposal, existing EV rates, on-going education efforts, and other existing or approved programs, provide a comprehensive package of solutions to address important market barriers and enhance and accelerate existing efforts.”).

³¹ SCE performed targeted outreach to the owners and managers of multiple-unit dwellings at the request of the CRPP advisory board, using its Customer Relationship Management System to identify leads.

1 ORA’s opening testimony it would result in a \$5 million budget. Comparatively, PG&E’s Fleet-
2 Ready Program addresses E&O explicitly, and only calls for “\$9.9 million in expenses for the
3 education and outreach portion of the program budget...[which] accounts for roughly 4 percent
4 of program spend.”³² PG&E’s E&O funding request is almost identical to the E&O funding
5 authorized for its light-duty pilot in Decision (“D.”)16-12-065, which found that “E&O should
6 not exceed \$10 million...as part of the total authorized program budget of \$130 million.”³³ It is
7 notable that this decision, made as recently as December 2016, was reached because “the
8 proceeding record related to the proposed E&O activities is insufficient to allow [the
9 Commission] to meaningfully assess the proposed program costs.”³⁴ The record here is also
10 insufficient to determine a reasonable E&O budget, and while GPI/CEC asserts that “GPI/CEC
11 have highlighted consistently the importance of education and outreach... with respect to
12 achieving the state’s ambitious EV and climate change goals,”³⁵ they do not make any reference
13 or citation to relevant data in this testimony for this proceeding. ORA recommends SCE further
14 consult with fleet owner stakeholder groups and marketing professionals to identify a specific
15 scope of outreach activities and reasonable amount of funding. Additionally, whether or not the
16 Commission adopts this recommendation, ORA recommends that E&O funding authorized by
17 the Commission for SCE’s MD/HD Infrastructure Program does not exceed \$10 million,
18 consistent with D.16-12-065.³⁶

19 **C. The Accurate Definition of Stranded Assets Should be**
20 **Clarified.**

21 In its testimony, CALSTART argues that “it is also worth considering that ratepayers
22 face stranded asset risk if California utilities do *not* deploy MHDV [Medium- and Heavy-Duty
23 Vehicle] infrastructure fast enough.”³⁷ CALSTART further states that the reason is
24 “Californians face being *stranded* with *assets* in the form of obsolete, polluting fossil

³² PG&E Testimony, p. 3-39.

³³ D.16-12-065, p. 71.

³⁴ D.16-12-065, p. 70-71.

³⁵ GPI/CEC Testimony, p. 12.

³⁶ Decision 16-12-065 in Application 15-02-009, Decision Directing Pacific Gas and Electric Company to Establish an Electric Vehicle Infrastructure and Education Program.

³⁷ CALSTART Testimony, p. 11.

1 technologies as other countries take the lead.”³⁸ It is unclear to ORA precisely what
2 CALSTART means with this assertion; therefore, ORA finds that a clarification of the concept
3 of stranded assets is in order.

4 In the regulatory sphere, a “stranded asset” refers to utility assets (such as infrastructure,
5 equipment, etc.) that are funded at *ratepayer* expense but are not used in such a way that benefits
6 ratepayers (e.g., excess capacity on the grid, extra repair trucks that are not needed to establish
7 electrical service, etc.) In this sense, the consideration is whether the utility asset serves a
8 purpose that is in the ratepayers’ interest.

9 **III. CONCLUSION**

10 For the above stated reasons, ORA recommends that the Commission:

- 11 1) Approve only a small pilot program with the potential for a full roll-out to ensure
12 that the program can be successful at the full scale;
- 13 2) Require SCE to consult with fleet owner stakeholder groups and marketing
14 professionals to identify a specific scope of outreach activities and reasonable
15 amount of E&O funding or, alternatively, cap the E&O budget at \$10 million;
- 16 3) Clarify the correct definition of stranded assets.

17

³⁸ CALSTART Testimony, p. 11. (Emphasis added).

APPENDIX A:

QUALIFICATIONS OF WITNESSES

1 QUALIFICATIONS AND PREPARED TESTIMONY
2 OF
3 RICKEY KIT TSE
4

5 **Q1.** Please state your name, business address, and position with the California Public Utilities
6 Commission.

7 **A1.** My name is Rickey Kit Tse and my business address is 505 Van Ness Avenue, San
8 Francisco, CA 94102. I am a Senior Utilities Engineer in the Energy Safety and
9 Infrastructure Branch of the Office of Ratepayer Advocates.

10
11 **Q2.** Please summarize your educational background.

12 **A2.** I attended the University of California at Davis. I graduated in 1999 with a Bachelor of
13 Science in mechanical engineering.

14
15 **Q3.** Briefly describe you professional experience.

16 **A3.** After graduating in 1999, I started my professional career at AT&T (then Pacific Bell) as
17 an engineer in the construction and engineering department designing telecom network in
18 support of high-speed DSL (Digital Subscriber Line) service. My core responsibilities
19 included facilities design, permitting, construction oversight, and budget management. I
20 spent about three years in the telecommunications industry before joining a consulting
21 firm as a civil engineer associate working on hydrology designs for small commercial
22 developments. In 2003, I started my career with the California Public Utilities
23 Commission as a utilities engineer in the Safety and Enforcement Division (formerly the
24 Consumer Protection and Safety Division). I spent the next 13 years working on General
25 Order 167 enforcement to ensure California power plants complied with Commission's
26 operation and maintenance standards. My responsibilities involved conducting outage
27 inspections, compliance audits, and incident investigations. I am a licensed professional
28 engineer and am technically-versed in power generation, transmission, and distribution
29 systems. In 2016, I joined the Office of Ratepayer Advocates and am the project
30 coordinator responsible for of the transportation electrification application proceeding
31 pursuant to Senate Bill 350.

32
33 **Q4.** What is your responsibility in this proceeding?

34 **A4.** I am sponsoring Chapter One of this prepared rebuttal testimony on PG&E's Fleet-Ready
35 program.

36
37 **Q5.** Does this conclude your prepared testimony?

38 **A5.** Yes, it does.
39

1 QUALIFICATIONS AND PREPARED TESTIMONY
2 OF
3 THOMAS GARIFFO
4

- 5 **Q1.** Please state your name, business address, and position with the California Public Utilities
6 Commission.
- 7 **A1.** My name is Thomas Gariffo and my business address is 505 Van Ness Avenue, San
8 Francisco, CA 94102. I am a Public Utilities Regulatory Analyst in the Electricity
9 Planning and Policy Branch of the Office of Ratepayer Advocates.
- 10 **Q2.** Please summarize your educational background.
- 11 **A2.** I have a Master’s Degree in Public Policy with honors from the Luskin School of Public
12 Affairs at UCLA, where I focused primarily on fields regarding environmental,
13 technology, and energy policy. Prior to UCLA, I received a Bachelor’s Degree in
14 Political Science from UC Berkeley with a focus on political communications and a
15 Minor in Public Policy from the Goldman School of Public Policy.
- 16 **Q3.** Briefly describe you professional experience.
- 17 **A3.** I have worked as an analyst for the Office of Ratepayer advocates for two years on
18 climate change programs such as transportation electrification and electric vehicle
19 initiatives, but also including the Low Carbon Fuel Standards, cap-and-trade, energy
20 storage, research and development funding, and renewable portfolio standards. Before
21 that, I interned at the Luskin Center for Innovation as research assistant to the director,
22 researching electric vehicle policies.
- 23 **Q4.** What is your responsibility in this proceeding?
- 24 **A4.** I am sponsoring Chapter 2.
- 25 **Q5.** Does this conclude your prepared testimony?
- 26 **A5.** Yes, it does.
27