



**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 Reductions Goals

Rulemaking 09-08-009  
(Filed August 20, 2009)

**REPLY COMMENTS OF SOUTHERN CALIFORNIA EDISON COMPANY (U 338-E)**  
**ON THE PROPOSED DECISION OF ASSIGNED COMMISSIONER RYAN**

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Dated: **June 15, 2010**

**SOUTHERN CALIFORNIA EDISON COMPANY'S (U 338-E) REPLY COMMENTS**

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**I. INTRODUCTION**

Pursuant to Rule 14.3 of the California Public Utilities Commission's Rules of Practice and Procedures, Southern California Edison Company (SCE) respectfully files its reply comments on the Proposed Decision of Assigned Commissioner Ryan in Phase 1 on Jurisdiction of the Commission Over the Sale of Electricity at Retail to the Public for the Sole Use as a Motor Vehicle Fuel (PD), issued May 21, 2010. SCE received opening comments from Environmental Defense Fund, Clean Energy Fuels, Los Angeles Department of Water and Power, San Diego Gas & Electric Company (SDG&E) and Southern California Gas Company (SoCalGas), Pacific Gas and Electric Company (PG&E), The Utility Reform Network (TURN), Division of Ratepayer Advocates (DRA), Californians for Renewable Energy (CARE) and North Coast Rivers Alliance (NCRA), Plug-In America, Natural Resources Defense Council (NRDC) and Friends of the Earth (FoE), and the EV Service Provider Coalition (EVSP Coalition). SCE replies to select comments of these parties, below.

## II. DISCUSSION

### A. Most Parties Advocate the Need to Affirm the Commission’s Specific Jurisdiction over EVSPs

A central point of concern for many parties is the PD’s lack of affirmation of the Commission’s regulatory authority over EVSPs to achieve specific mandates under California law. Most parties identified specific mandates in the California Public Utilities Code (Code) that give the Commission authority over EVSPs:

- Section 740.2 of the Code. CARE/NCRA appropriately point out that Section 740.2 directs the Commission to “exert the exact authority that the PD” claims the Commission does not retain;<sup>1</sup> specifically, the regulatory authority to impose rules of electric vehicle (EV) market participants to address the impacts on EVs on electrical infrastructure, grid stability, interoperability, integration with renewable resources, among other matters.<sup>2</sup>
- Sections 740.3 and 740.8 of the Code. NRDC/FoE note that Sections 740.3 and 740.8 direct the Commission to implement policies to promote the use of EVs in a way that protects the interests of ratepayers, including their interests in a safe and reliable grid.<sup>3</sup> NRDC/FoE also cite the Commission’s authority to ensure compliance of EVSP electricity sales with procurement requirements.
- Sections 454.5, 380 and 399.11 *et seq.* of the Code. DRA observes that the Commission has authority over the potential impacts of EVSP activities on long-term procurement and resource adequacy requirements.<sup>4</sup> DRA also cites the Energy Action Plan II as authority for the Commission to regulate EVSP activities to ensure compliance with the Loading Order. In a similar vein, NRDC/FoE emphasize the

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<sup>1</sup> See Opening Comments of CARE/NCRA, pp. 5-6.

<sup>2</sup> See also SCE’s opening comments, pp. 2, 4-6; also Opening Comments of PG&E, p. 2 (fn. 2).

<sup>3</sup> See Opening Comments of NRDC/FoE, p. 7; also Opening Comments of PG&E, p. 2 (fn. 2).

<sup>4</sup> See Opening Comments of DRA, pp. 7-9.

Resource Adequacy (RA) and Renewables Portfolio Standards (RPS) mandates, which direct the Commission to ensure that retail electricity sales comply with California procurement requirements.<sup>5</sup> NRDC/FoE illuminate the need to regulate EVSP compliance with procurement requirements to the extent they procure wholesale electricity for resale in the IOU service areas. PG&E makes similar comments.<sup>6</sup>

- SB 1368 and AB 32. NRDC/FoE note the Commission’s authority under Senate Bill (SB) 1368 and Assembly Bill (AB) 32 to ensure that EV charging is accomplished in a manner that does not increase reliance on fossil fuels, but rather achieves greater integration of renewable resources.<sup>7</sup>

This list is not exhaustive, but sufficiently demonstrates the breadth of the Commission’s authority to achieve specific mandates under California law through regulation of public utilities and *non-public utilities*. Thus, while parties disagree about whether EVSPs should be regulated as public utilities, most appear to agree that the Commission not only has the authority under specific statutes to regulate EVSPs, but must affirm this authority in the final decision to ensure that the Commission can be effective in achieving California’s objectives for EVs.

To this end, SCE recommends the Commission make expressly clear in the final decision that it retains specific jurisdiction over EVSPs for specific mandates applicable to EVSP activities under the Code, including those set forth in SB 626. The PD’s disclaimer of Commission jurisdiction should be limited to its regulation of EVSPs as *public utilities*, and not for other specific purposes applicable to EVSP activities under the Code.<sup>8</sup>

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<sup>5</sup> See Opening Comments of NRDC/FoE, pp. 5-9. See also Opening Comments of PGE, p. 5; SCE, pp. 6-7.

<sup>6</sup> See Opening Comments of PG&E, pp. 5-6.

<sup>7</sup> See Opening Comments of NRDC/FoE, pp. 5-6. See also Opening Comments of SCE, pp. 4-7.

<sup>8</sup> See Opening Comments of SCE, pp. 4-6.

**B. SCE Agrees with PG&E that FERC’s Jurisdiction Over Sales for Resale Must be Addressed in the Final Decision**

PG&E in its opening comments appropriately raises the issue of the Federal Energy Regulatory Commission’s (FERC) jurisdiction over the investor-owned utilities’ (IOUs) sales for resale,<sup>9</sup> which the PD fails to address. SCE’s opening comments also address this issue.<sup>10</sup> PG&E proposes that the Commission address the issue by exerting public utility jurisdiction over EVSPs;<sup>11</sup> whereas SCE proposes that the Commission regulate EVSPs’ electricity resales in the same manner it currently does for the electricity resales permitted under Rule 18.<sup>12</sup>

Despite the different approaches, PG&E and SCE appear to agree that, in the absence of the Commission’s regulation of the EVSP electricity resales, the IOUs’ sales to EVSPs would be subject to FERC’s jurisdiction under the Federal Power Act. The Commission cannot simply assume in the final decision that it has jurisdiction over the IOUs’ sales to EVSPs.

Accordingly, the final decision should address the issue by clarifying the Commission’s intent to regulate the EVSPs’ electricity resales. Otherwise, the final decision should direct the IOUs to seek a FERC order disclaiming jurisdiction over IOUs sales to EVSPs, or seek FERC’s approval of rates specifically for EVSP electricity resale service.

**C. The Final Decision Should Clarify Whether Its Holding Extends to Electrical Corporations’ Investments in EV Charging Equipment Behind the Meter**

Several parties in their opening comments appear to assume that the PD’s main holding (that the provision of EV charging services is a public utility service) does not apply to electrical corporations that seek to invest in EV charging equipment behind the meter.<sup>13</sup> PG&E, on the other hand, interprets the PD’s holding to apply to all parties, including electrical corporations,

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<sup>9</sup> See Opening Comments of PG&E, pp. 5-6

<sup>10</sup> See Opening Comments of SCE, pp. 7-9.

<sup>11</sup> See Opening Comments of PG&E, p. 6.

<sup>12</sup> See Opening Comments of SCE, p. 9; also SCE’s opening and reply briefs, *generally*.

<sup>13</sup> See Opening Comments of SDG&E, p. 2, and Clean Energy, Section III.

thereby potentially barring IOUs from ratebasing investments in EV charging equipment on the customer's side of the meter.<sup>14</sup>

Given the PD's stated objective to bring "certainty" to the EVSP market, the PD should be clear as to whether its holding extends to electrical corporations that seek to invest in EV charging equipment on the customer's side of the meter. SCE, like PG&E, assumes that it would, given the PD's conclusion that EV charging stations do not constitute "electric plant" under the Code.

### **III. CONCLUSION**

SCE appreciates the opportunity to submit these reply comments.

Respectfully submitted,

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June 15, 2010

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<sup>14</sup> See Opening Comments of PG&E, pp. 7-8.

**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 **REPLY COMMENTS OF SOUTHERN CALIFORNIA EDISON COMPANY (U 338-E) THE PROPOSED DECISION OF ASSIGNED COMMISSIONER RYAN** on all parties identified on the attached service list(s). Service was effected by one or more means indicated below:

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Executed this **15th day of June, 2010**, at Rosemead, California.

/s/ Andrea Moreno

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