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

Order Instituting Rulemaking to Address
Utility Cost and Revenue Issues Associated
With Greenhouse Gas Emissions

Rulemaking 11-03-012
(Filed March 24, 2011)

**REPLY COMMENTS OF COULOMB TECHNOLOGIES, INC.
AND ECOTALITY, INC.**

Coulomb Technologies, Inc. (“Coulomb”) and ECotality, Inc. (“ECotality”) are members of the Electric Vehicle Service and Equipment Provider Coalition (“EVSEP Coalition”), which has submitted a proposal in this proceeding and is separately filing reply comments on behalf of the Coalition. On each company’s own behalf, and not as members of the EVSEP Coalition, Coulomb and ECotality submit these additional reply comments to offer conditional support for the concept of using Low Carbon Fuel Standard (“LCFS”) credit revenues to provide direct rebates to plug-in electric vehicle (“PEV”) purchasers.

The International Council on Clean Transportation (“ICCT”) states that:

[A] PEV POP [point of purchase] rebate that captures some portion of the expected future value of LCFS credit generation would provide the most effective incentive for PEV purchases. An annual rebate could also incentivize PEV purchases, but would require higher LCFS credit values, low administrative costs and significant customer education to do so effectively.¹

Coulomb and ECotality conceptually support direct rebates to PEV purchasers as an alternative worth consideration. Like the Coalition’s proposal for rebates to purchasers of EVSE, rebates to individuals who purchase PEVs may encourage some potential buyers to make the investment in a new electric vehicle, and thus would be consistent with a key goal of this proceeding.

¹ ICCT Comments at 1.

If the Commission adopts the ICCT proposal or any similar approach, the rebate should go directly to the consumer, not to a dealer or OEM. Eligibility for the rebate should be OEM and technology-neutral. The rebate should be clearly identified as related to the LCFS program in order to ensure maximum visibility, and the Commission should make every effort to minimize administrative costs.

Dated: July 10, 2012

Respectfully submitted,

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