

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



FILED

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

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

NOTICE OF EX PARTE COMMUNICATION BY GENERAL MOTORS

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May 17, 2012

NOTICE OF EX PARTE COMMUNICATION BY GENERAL MOTORS

Pursuant to Rule 8.4 of the Rules of Practice and Procedure of the California Public Utilities Commission ("Commission"), General Motors hereby gives notice of the following *ex parte* communications.

The communications began with a procedural email on May 9, at 7:51 AM, from Ed Pike of International Center on Clean Transportation thanking those who attended a meeting on May 8, 2012 during the EVS Conference regarding the allocation of LCFS credits. The email provided an attachment with a meeting summary and included ALJ Hecht and ALF Semcer on copy.

On May 9, 2012, at 5:20 PM, Chuck Shock provided the following response to those copied on the original Ed Pike email:

Enjoyed the discussion yesterday. One idea that occurred to me while listening to Ken Kurani's talk this morning about green electrons: How about using the LCFS annual value to purchase additional renewables in an amount equal to the annual electricity use attributed to EVs? This could be advertised by the dealer at point of sale, e.g. as a feature of this vehicle the electricity used to power it will come from green sources. (This would not be true of course on strict electron basis for every individual car but in aggregate would cover all EV electricity). Based on NRDC estimates this likely would require only a portion of the LCFS value, but it strikes me as an interesting way to spend the limited \$\$ in a way that might capture consumer interest.

Some positives--this would return value to all customers, not just new purchasers; would be visible at point of sale; would be easy to administer; could be done right away and thus would make use of credits rather than having them pile up.

Some negatives (some raised by a few of you that I talked to earlier)--might not satisfy ARB's vision of how to return value to customers; would not be a reward to the relatively high percentage of existing purchasers who have installed solar (on the other hand (1) it would cover their charging away from home, and (2) the rebate idea also does not cover existing owners); for those of you who heard the closing plenary, it reinforces the "EV as medicine" emphasis on "do what is good for you" that the speaker urged automakers to get away from.

Might be a moot point since the PUC process is far along but I am curious about reaction, in particular from automakers. Would this provide a useful incentive,

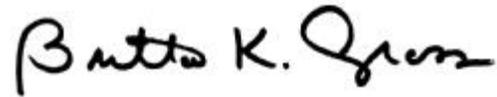
particularly in comparison to giving an equivalent dollar amount as an annual rebate?

On May 14, 2012, at 6:56 AM, Britta Gross from General Motors provided the following response to those copied Chuck Shock's email:

My feeling is that although this is a nice-to-have benefit, it's too intangible and won't likely draw new folks into the showroom to purchase a plug-in-vehicle, and doesn't address the up-front cost hurdle. Keep looking for something more compelling (in concept, if not in dollar value).

Dated: May 17, 2012

Respectfully submitted,

A handwritten signature in black ink that reads "Britta K. Gross". The signature is written in a cursive, flowing style.

Britta K. Gross
General Motors