



**FILED**

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

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 reduction goals.

R.09-08-009  
(Filed August 20, 2009)

**OPENING COMMENTS OF NISSAN NORTH AMERICA, INC. TO  
PHASE 2 DECISION ESTABLISHING POLICIES TO OVERCOME  
BARRIERS TO ELECTRIC VEHICLE DEPLOYMENT AND COMPLYING  
WITH PUBLIC UTILITIES CODE SECTION 740.2**

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April 15, 2011

**OPENING COMMENTS OF NISSAN NORTH AMERICA, INC. TO  
PHASE 2 DECISION ESTABLISHING POLICIES TO OVERCOME  
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WITH PUBLIC UTILITIES CODE SECTION 740.2**

Nissan North America, Inc. is requesting party status to file comments to the CPUC. Nissan North America, Inc. agrees with the intent of the CPUC's draft Phase 2 decision to overcome barriers to electric vehicle adoption, and is generally supportive. Our comments are as follows:

**Notification**

Nissan North America, Inc. recognizes that grid reliability and safety are of utmost importance, and in order to provide the utility with data necessary for operational planning, Nissan is working proactively and diligently to include the utility in the Nissan LEAF purchase process, including:

- (a) Implementing a utility notification system while also complying with consumer privacy laws. Significant investment is underway to build a secure database that can be scaled to allow utilities across the nation access to Nissan LEAF customer address information for their service territory (with customer approval). This system is currently in deployment.
- (b) A utility "landing page" which allows the utility to display special programs and EV rate options as well as contact information has been integrated into the Nissan LEAF website. This web page provides data for the customers electricity service provider based on the consumer's zip code.
- (c) A "contact your utility" reminder e-mail which is sent directly to the Nissan LEAF customer has been added to the home assessment phase of the online order process.
- (d) In addition, "contact your utility" messaging has been integrated into dealership training materials nationwide.

Nissan disagrees with the decision to establish a proposal for a data clearing house in the next 120 days. This seems premature for several reasons:

- (e) Nissan and other OEM notification systems are now in the early stages of implementation and have not had a chance to be evaluated for effectiveness. Bilateral agreements between OEMs and utilities may be a simpler and more cost-effective way to realize the operational objectives of utility notification.
- (f) National efforts are concurrently being explored, and resources may be wasted on duplicate efforts at the state and national level.
- (g) Private market data providers in the automotive industry may be equally or more effective in identifying the movement of EV owners through the use of registration information as the EV industry grows.
- (h) The proposed clearing house mixes marketing efforts and service planning through the CPUC suggestion to, “include opportunities to connect charging stations to drivers and to develop PEV information campaigns targeted at specific PEV growth areas.” As Nissan maintains a strong commitment to customer privacy, we view this potential mixing of marketing and service planning as a concern.

In summary, Nissan is already investing in a utility notification system and recommends evaluating the effectiveness of the current methods before additional investment is committed to a California-specific clearing house.

### **EVSE Ownership**

Regarding Section 6.6.3, prohibiting utility ownership of EVSE seems premature. Other markets are seeing the development of business models where the utility owns the EVSE. For example, NRG in Texas has created the eVgo program where the utility installs and owns residential and public infrastructure. EV customers can pay a monthly subscription fee and do not need to invest upfront capital. As electric vehicle ecosystems are in the early stages of development in California and across the country, Nissan would recommend that all potential options for the development of charging infrastructure remain open while the various business models evolve.

Dated April 15, 2011

Respectfully submitted,

/s/ TRACY WOODARD

Tracy Woodard  
Director, Government Affairs  
Nissan North America, Inc.

## CERTIFICATE OF SERVICE

I, Russell Vare, hereby certify that I have on this date caused the attached **OPENING COMMENTS OF NISSAN NORTH AMERICA, INC. ON THE PROPOSED DECISION** in R.09-08-009 to be served to all known parties by either United States mail or electronic mail, to each party named in the official attached service list obtained from the Commission's website, attached hereto, and pursuant to the Commission's Rules of Practice and Procedure.

Dated April 15, 2011 in Los Angeles, California.

/s/ RUSSELL VARE

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