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

Application of Southern California Edison
Company (U338E) for Approval of Its Charge
Ready and Market Education Programs

Application 14-10-014
(Filed October 30, 2014)

SOUTHERN CALIFORNIA EDISON COMPANY'S (U 338-E)
PETITION FOR MODIFICATION OF DECISION 16-01-023 REGARDING
SOUTHERN CALIFORNIA EDISON COMPANY'S APPLICATION
FOR CHARGE READY AND MARKET EDUCATION PROGRAMS

FADIA RAFEEDIE KHOURY
ANDREA L. TOZER

Attorneys for
SOUTHERN CALIFORNIA EDISON COMPANY

2244 Walnut Grove Avenue
Post Office Box 800
Rosemead, California 91770
Telephone: (626) 302-6713
Facsimile: (626) 302-6693
E-mail: Andrea.Tozer@sce.com

Dated: **March 5, 2018**

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I.

INTRODUCTION AND SUMMARY OF RELIEF REQUESTED

Pursuant to Rule 16.4 of the California Public Utilities Commission’s (“CPUC’s” or “Commission’s”) Rules of Practice and Procedure, Southern California Edison Company (“SCE”) respectfully submits this Petition for Modification of Decision (D.) 16-01-023 (“Petition” or “PFM”). This Petition seeks to modify the decision (“Decision”) approving SCE’s Charge Ready and Market Education Phase 1 Programs (“Charge Ready Pilot” or “Phase 1”) to authorize bridge funding that would extend the Charge Ready Pilot until the Commission issues a decision on SCE’s Charge Ready Phase 2 application. The Charge Ready Pilot is expected to fully commit funds authorized by the Decision in mid-2018.¹ SCE intends to file its Charge Ready Phase 2 application in Q2 2018. Since the new proposal may not be approved until late

¹ In January 2017, the Charge Ready Pilot was fully subscribed using estimated costs. However, Charge Ready did not use contingency funds at some completed sites. Therefore, SCE will re-open the pilot on a limited basis to accept new applications for the remaining available funding. The released funding, approximately \$3.3 million, will support approximately 177 additional ports (above the currently in-progress 1,066 ports). Declaration of Katie Sloan Moody, attached hereto as Appendix B (Sloan Moody Declaration), para. 15.

2019, there may be a significant unanticipated gap in the Charge Ready program. Such a gap would create uncertainty for customers and contractors, as well as implementation and staffing challenges for SCE and its participating vendors. Accordingly, SCE requests that the Commission modify the Decision to authorize bridge funding to extend the Charge Ready Pilot.

Specifically, SCE proposes to maintain the current pilot as authorized in the Decision but, as discussed in greater detail below, SCE seeks authority to record revenue requirements associated with up to an additional \$22 million to the Charge Ready Program Balancing Account, which will allow SCE to continue implementing the Pilot at existing funding levels until the Commission approves Charge Ready Phase 2. SCE estimates that the additional \$22 million can support a minimum of 1,000 charge ports during the period between approval of this Petition and the implementation of the Charge Ready Phase 2 program as approved by the Commission. The approved bridge funding dollars will, in turn, reduce the budget the Commission approves for SCE's Charge Ready Phase 2. SCE requests that the bridge funding begin after Charge Ready Pilot funds are fully committed, and after: (a) SCE files the Charge Ready Phase 1 Pilot Report on April 2, 2018, and (b) SCE completes installation of the first 1,000 Charge Ready ports in Q2 2018. Lastly, because this Petition seeks conventional bridge funding simply to avoid a program gap, SCE does not request any program changes to the Charge Ready Phase 1 Pilot for bridge-funded installations.

In the Decision, the Commission directed SCE to continue installations under Phase 1 while Phase 2 is under consideration by the Commission, until SCE's authorized Phase 1 budget is expended.² The Commission believed that the funds authorized in Phase 1 "should contribute to limiting a gap in deployment between Phase 1 and 2, should SCE propose an application for Phase 2[.]"³ This assumption, however, turned out to be incorrect. In fact, SCE was unable to file its Phase 2 application in time to avoid a gap between phases, because prerequisite

² D.16-01-023, Ordering Paragraph (OP) 7 at p. 61.

³ *Id.*, p. 30.

milestones established in the Decision had not yet been met.⁴ SCE is concerned that charging station installations may slow down significantly during this gap period as customers wait for a new SCE-funded program to be launched.

This Petition is being filed more than one year after the Decision was issued and, therefore, pursuant to Rule 16.4(b), SCE is submitting accompanying declarations setting forth relevant new or changed facts. Within one year of the Decision, SCE had reserved funding based on forecast Pilot costs, but had not installed any infrastructure and did not have actual costs for the majority of the approved budget.⁵ At that point, SCE had also not yet obtained results from the Pilot.⁶ As discussed herein, SCE now has sufficient information to justify the need for bridge funding to continue the Pilot until SCE's Phase 2 application is approved.

If approved, SCE's requested bridge funding would support the acceleration of transportation electrification to reach California's goal of 5 million zero-emission vehicles on the road by 2030,⁷ reduce California's Greenhouse Gas ("GHG") emissions to 40 percent below 1990 levels by 2030,⁸ and improve air quality.⁹ Accordingly, the objective of this Petition is to satisfy customer interest in the program and provide incentives to more applicants sooner, creating more certainty for customers to plan charging station deployments and support California's ambitious climate and air quality goals.

⁴ Sloan Moody Declaration, para. 11.

⁵ *Id.*, para. 12.

⁶ *Id.*, para. 10.

⁷ Executive Order B-48-18 (January 26, 2018).

⁸ See SB No. 32, Chapter 249, An Act to add §38566 to the Health and Safety Code, relating to greenhouse gases. Approved by Governor September 8, 2016, filed with Secretary of State September 8, 2016.

⁹ See D.16-01-023, Findings of Fact (FOF) 21 at p. 54.

II.

BACKGROUND

The Charge Ready and Market Education programs were developed to support California's policies to reduce GHG and air pollutant emissions, in an effort to meet the state's zero-emission vehicle ("ZEV") goals. The Charge Ready program deploys electric infrastructure to serve qualified EV charging stations throughout SCE's service territory, while the Market Education program targets car buyers, to help consumers gain awareness of EVs and the benefits of fueling from the grid. The Market Education program also included a launch of SCE's advisory services, specific education and support related to electrifying fleets, EV charging, reducing GHG footprints, and other related TE areas for business customers. Each program was designed in two phases, with a smaller-scope Phase 1 Pilot to prepare for a broader Phase 2.

Under the Charge Ready Program, SCE installs and owns the make-ready infrastructure, a part of electric vehicle charging that, in the absence of this program, would be purchased and installed by a customer. Installation and ownership of the make-ready infrastructure by SCE significantly reduces upfront costs for customer participants.¹⁰ The Decision approved the Phase 1 Program to encourage the growth of EV charging stations and provide assessment information. The Decision ordered SCE to continue installations under Phase 1 while Phase 2 is under consideration by the Commission, until its authorized Phase 1 budget is expended.¹¹ SCE anticipates filing the Phase 2 application in Q2 2018. Without the bridge funding requested in this Petition, there will be a detrimental pause in the Charge Ready Program that this Petition, if approved, will avoid.

The Decision adopted, with modifications, a multi-party settlement supporting SCE's Charge Ready Program. The settling parties and the Commission recognized the importance of minimizing a gap between Charge Ready Phase 1 and any Phase 2. In fact, the Settling Parties

¹⁰ *Id.*, FOF 8, 9 at p. 52.

¹¹ *Id.*, OP 7 at p. 61.

envisioned that Phase 1 would “continue until the Commission issues a decision on Phase 2.”¹² They also agreed that it would be appropriate for the Commission to simply set a prehearing conference to begin regulatory review of Phase 2 once SCE had filed its pilot report.¹³ Though the Commission modified the settlement to require the filing of a Phase 2 application (which SCE will file in Q2 of this year), it nonetheless “agree[d] with SCE that certain efficiencies may exist in moving seamlessly from a pilot to full-scale deployment.”¹⁴ The Decision further stated, “we [the Commission] are sympathetic to parties’ calls for rapid movement”¹⁵ and that it is “reasonable to minimize regulatory delay to the extent feasible.”¹⁶ This Petition is thus filed consistent with the spirit of the Decision’s commitment to a seamless transition, but it does not purport to prejudge the outcome of the Phase 2 application, which, as the Decision made clear, will be subject to thorough review by stakeholders and the Commission.

III.

SUPPORT FOR RELIEF REQUESTED

The modifications proposed in this Petition, if adopted, would meet the overall objective of the Decision to “allow for a smooth transition to Phase 2, encourage the growth of EV charging stations, and provide useful assessment information.”¹⁷ As noted above, Charge Ready Phase 1 is not accepting new applications, however, customers have continued to express interest in participating in the program.¹⁸ SCE will continue to secure additional commitments to back-fill any customer dropouts or withdrawals and use any remaining funding that is released as

¹² *Id.*, p. 28 (citing Proposed Settlement at 9).

¹³ *Id.*, p. 28.

¹⁴ *Id.*, p. 29.

¹⁵ *Id.*

¹⁶ *Id.*, p. 30.

¹⁷ *Id.*, pp. 50-51.

¹⁸ Sloan Moody Declaration, para. 7.

projects are completed.¹⁹ The modifications requested in this Petition would further the objectives of the Charge Ready Program, support California's ambitious GHG emissions reduction and air quality goals, and promote greater EV adoption.

A. California's GHG goals are some of the most ambitious in the world and require significant acceleration of transportation electrification.

California's goals to reduce the state's total GHG emissions by 40 percent from 1990 levels by 2030 and 80 percent by 2050 are some of the most ambitious in the world and will be difficult to meet.²⁰ While California has reduced GHG emissions nine percent from their peak in 2004, meeting 2030 requirements and 2050 goals will require emissions reductions more than three times the annual rate achieved between 2004 and 2014, or the equivalent of eliminating emissions from 2.6 million homes each year.²¹ Given the amount of time needed to build infrastructure and change consumer behavior, accelerating transportation electrification is critically important, as the next deadline (2030) is only 12 years away. Every time a vehicle is purchased and stays on the road for approximately 10 years, there is an opportunity to convert

¹⁹ *Id.*, para. 6.

²⁰ California and 13 other North American and European Governments announced on December 3, 2015, as part of the Conference of Parties (COP) 21 Climate Summit in Paris, that they will strive to make all passenger vehicle sales in their respective jurisdictions ZEVs as fast as possible, and no later than 2050. See ZEV Alliance Press Statement, *International Alliance Aims for All New Cars to be Zero-Emission by 2050* (Dec. 3, 2015), available at http://www.zevalliance.org/wp-content/uploads/2016/11/ZEV-Alliance-COP22-press-release_16-November-2016.pdf Governor Brown signed SB 350, which recognized that “[r]educing emissions of greenhouse gases to 40 percent below 1990 levels by 2030 and to 80 percent below 1990 levels by 2050 will require widespread transportation electrification.” SB 350 also required the Commission to direct electrical corporations to file applications for programs and investments to accelerate widespread transportation electrification [in order] to reduce emissions and “reduce dependence on petroleum, meet air quality standards, achieve the goals set forth in the Charge Ahead California Initiative.” In September 2016, Governor Brown also signed SB 32, which directs CARB to ensure that statewide greenhouse gas emissions are reduced to 40 percent below the 1990 level by 2030.

²¹ See CARB's Assembly Bill (AB) 32 Fact sheet (Oct. 29, 2007), available at <https://www.arb.ca.gov/cc/factsheets/1mmtconversion.pdf>, see also U.S. Census. California households produce the equivalent of 5.2 million metric tons (MMT) of carbon dioxide (CO₂) emissions per year. Reducing statewide emissions at a rate of 17.2 MMT per year would require eliminating emissions from 2.6 million homes per year to keep pace, and emissions abatement goals cannot be achieved solely by eliminating emissions from all 13 million California households.

fossil-fuel-powered vehicles to clean vehicles. If that opportunity is missed, the vehicle will likely not be converted to a clean vehicle for another decade or more.²² Through this PFM, SCE is demonstrating its commitment to achieving the state's goals by eliminating barriers to EV adoption with continuous and consistent programming.

B. Continued Funding Will Accelerate Transportation Electrification in the State.

If approved, this PFM will complement SCE's proposed TE portfolio, coupled with its EV rate proposal, existing EV rates, on-going education efforts, and other existing and approved programs. In the Decision, the Commission found that the upfront costs of installing charging stations can inhibit the pace of their deployment.²³ Without SCE's Charge Ready program, customers may delay or decline to install necessary EV charging infrastructure during the gap between the Pilot and Phase 2.²⁴ Kitu Systems, a vendor in the Charge Ready Pilot, provided the example of at least two customers that are declining to install desired charging infrastructure unless and until additional SCE program funding becomes available.²⁵ The Petition minimizes the risks posed by the gap between phases by continuing to provide infrastructure and rebates to support charging stations in long-dwell locations, including workplaces and multi-unit dwellings.²⁶ State and local regulators and legislators have a very important role to play in eliminating barriers to EV adoption. Promptly reviewing and approving this PFM is imperative to enable SCE to facilitate transportation electrification by providing this essential program supporting light-duty EV charging.

If approved, the requested bridge funding is expected to support the deployment of at least 1,000 additional qualifying charging stations in SCE's service territory, at participating long dwell-time locations owned or operated by SCE's non-residential customers, such as workplaces,

²² Sloan Moody Declaration, para. 5.

²³ See D.16-01-023, FOF 3 at p. 52.

²⁴ Sloan Moody Declaration, para. 16.

²⁵ Declaration of Vincent Weyl, attached hereto as Appendix C.

²⁶ Sloan Moody Declaration, para. 18.

multi-unit dwellings (“MUDs”), fleets, and destination locations.²⁷ Reliable access to daily charging is a critical enabler of EV adoption, yet the cost of installing EV charging infrastructure may constitute a barrier to entry for potential EV adopters.²⁸ Bridge funding will provide market certainty to promote the needed increase in EV adoption, which in turn improves air quality and reduces GHG emissions.²⁹

As discussed above, providing market certainty can increase EV adoption. In addition, bridge funding will also provide operational benefits by avoiding a stop and restart of the infrastructure program.³⁰ Over the past few years, SCE has built internal capabilities in the outreach, assessment, and deployment of charging infrastructure. With bridge funding, SCE will be able to keep this momentum to efficiently install charging infrastructure, rather than retraining and remobilizing resources, which cause unnecessary delays.³¹ Continuation of the program will provide additional certainty to external resources and allow them to quickly execute on customer projects.³² Charge Point, a vendor in the Charge Ready Pilot, explains that a gap in the program impacts customer experience, market certainty, and the confidence of vendors to invest resources to support the program.³³

C. Disadvantaged Communities Benefit From Expanded EV Markets and Charging Infrastructure.

Passenger cars, SUVs and pickup trucks currently contribute one-quarter of California’s GHG emissions.³⁴ At least 24 percent of these vehicles need to be electrified statewide by 2030,

²⁷ *Id.*, para. 17.

²⁸ *See* D.16-01-023, p. 14.

²⁹ Sloan Moody Declaration, para. 19.

³⁰ *Id.*, para. 20.

³¹ *Id.*, para. 21.

³² *Id.*, para. 20.

³³ Declaration of ChargePoint, Inc., attached hereto as Appendix D.

³⁴ Sloan Moody Declaration, para. 3.

totaling approximately seven million EVs.³⁵ EVs charging from an increasingly clean electric grid can help reduce transportation sector GHG emissions from 169 to 111 MMT/year, one-third of the 2030 goal.³⁶ Bridge funding supports this trend with additional infrastructure to reduce range anxiety and support new travel modes. With current incentives, many EVs are cost competitive with traditional vehicles,³⁷ but more charging infrastructure is necessary to reduce range anxiety.³⁸ This is a fundamental problem, because availability of charging infrastructure stimulates demand for EVs. This Petition, if granted, would allow SCE to continue installing charging infrastructure so that it is visible and available to drivers.

As almost half of the state's disadvantaged communities are within SCE's service territories, SCE will continue to target disadvantaged communities when implementing these programs. In the Charge Ready Phase 1 Pilot, SCE has thus far deployed infrastructure to support 826 charge ports at 53 customer sites, including 424 charge ports (51%) at 33 sites located in disadvantaged communities, significantly exceeding the Pilot's goal of placing 10% of charge ports in disadvantaged communities.³⁹ SCE plans to complete construction on infrastructure to support a total of 1,066 charge ports by Q2 2018 and deploy approximately 177 additional ports, within the original Commission-approved budget.⁴⁰ By continuing the Pilot until Commission approval of Phase 2, SCE can support the state's clean energy goals by helping

³⁵ *Id.*

³⁶ *Id.*

³⁷ McKinsey & Co., Bloomberg New Energy Finance, *An Integrated Perspective on the Future of Mobility* (Oct. 2016), available at https://data.bloomberglp.com/bnef/sites/14/2016/10/BNEF_McKinsey_The-Futureof-Mobility_11-10-16.pdf.

³⁸ See National Research Council of the National Academies, *Overcoming Barriers to Electric-Vehicle Deployment: Interim Report*, (Feb. 2013), pp. 35-36, available at http://www.nap.edu/openbook.php?record_id=18320. See also ICF International Inc., *Bay Area Plug-In Electric Vehicle Readiness Plan: Background and Analysis*, pp. 9-10 (Dec. 2013), available at <http://www.baaqmd.gov/~media/files/strategic-incentives/ev-ready/bay-area-pev-readiness-plan-backgroundand-analysis-web-pdf.pdf?la=en>.

³⁹ Sloan Moody Declaration, para. 14.

⁴⁰ *Id.*, para. 15.

to ensure accessibility to EV charging in disadvantaged and low- and moderate-income communities.

IV.

CONCLUSION

SCE respectfully requests that the Commission grant this Petition as expeditiously as possible.⁴¹ By approving the requested bridge funding, the Commission will enable SCE to provide greater certainty in the charging infrastructure market for its customers and vendors, allow for the seamless transition to Phase 2 envisioned by the Decision, and encourage the growth of EV charging stations to support California's ambitious goals. Prompt Commission action will keep pace with customer interest and maintain the installation pace for this important infrastructure.

Respectfully submitted,

FADIA RAFEEDIE KHOURY
ANDREA L. TOZER

/s/ Andrea L. Tozer

By: Andrea L. Tozer

Attorney for
SOUTHERN CALIFORNIA EDISON COMPANY

2244 Walnut Grove Avenue
Post Office Box 800
Rosemead, California 91770
Telephone: (626) 302-6713
Facsimile: (626) 302-6693
E-mail: Andrea.Tozer@sce.com

DATE: March 5, 2018

⁴¹ Rule 16.4(b) requires that this Petition "propose specific wording to carry out all requested modifications to the decision." See Appendix A.

Appendix A

Proposed Language to Support Petition to Modify D.16-01-023

APPENDIX A

Proposed Language Modifying D.16-01-023

Order

IT IS ORDERED that:

1. The Southern California Edison Company is authorized to recover the revenue requirements associated with up to ~~\$22~~ \$44 million (2014\$) of capital and operations and maintenance expenditures for implementation of Phase 1 of its Charge Ready and Market Education Programs.

6. The terms in the Settlement filed July 9, 2015, are modified such that the Southern California Edison Company (SCE) shall file and serve a pilot report to provide Phase 1 data, and recommend any necessary changes to Phase 2, after at least 12 months of program implementation and at least 1,000 charging station installations, but in any event, within 24 months of program implementation. The terms in the Settlement filed July 9, 2015, regarding cost management and program suspension are modified such that SCE is authorized to establish a Charge Ready Balancing Account, using the standard commercial paper rate, to record the authorized revenue requirements associated with up to ~~\$22~~ \$44 million (2014\$) of capital and operations and maintenance expenditures for its Charge Ready and Market Education Programs. Costs shall be reviewed in SCE's annual Energy Resource Recovery Account application.

8. The Southern California Edison Company shall file a Tier 1 advice letter to ~~establish~~ update the Charge Ready ~~Program~~ Balancing Account within ~~60~~30 days of this decision to reflect approval to recover the revenue requirements associated with up to ~~\$22~~ \$44 million (2014\$) of capital and operations and maintenance expenditures for implementation of Phase 1 of its Charge Ready and Market Education Programs.

Appendix B

Declaration of Katie Sloan Moody

DECLARATION OF KATIE SLOAN MOODY
IN SUPPORT OF THE PETITION FOR MODIFICATION OF
SOUTHERN CALIFORNIA EDISON

I, KATIE SLOAN MOODY, declare and state:

1. I am Principal Manager, Innovation, Development, & Controls, at Southern California Edison (SCE or the Company). As such, I have responsibility for overseeing the implementation and operations of the Charge Ready Pilot Program.
2. In this Petition for Modification (PFM), SCE requests \$22 million for bridge funding for the Charge Ready Pilot Program to avoid stopping the pilot, which creates customer, vendor, and market uncertainty.
3. Passenger cars, SUVs and pickup trucks currently contribute one-quarter of California's GHG emissions. At least 24 percent of these vehicles — 7 million — need to be electrified by 2030. EVs charging from an increasingly clean electric grid can help reduce transportation sector GHG emissions from 169 to 111 MMT/year, one-third of the 2030 goal.
4. Given the amount of time needed to build infrastructure and change consumer behavior, acceleration of transportation electrification is critically important, as the deadline to achieve the State's 2030 GHG-reduction goal is only 12 years away.
5. Every time a vehicle is purchased and stays on the road for approximately 10 years, there is an opportunity to convert fossil-fuel-powered vehicles to clean vehicles. If that opportunity is missed, the vehicle will likely not be converted to a clean vehicle for another decade or more.
6. The Charge Ready Pilot stopped accepting new applications in January 2017, but will temporarily re-open in order to use additional funds remaining in the program. SCE will continue to secure additional commitments to back-fill any customer dropouts or withdrawals and use any remaining funding that is released as projects are completed.

7. Although Charge Ready Phase 1 is not accepting new applications, customers have continued to express interest in participating in the program.

8. Charge Ready will re-open to accept new applications for \$3.3M of available funding. The released funding will support approximately 177 more EV charging ports (above the currently in-progress 1,066 ports).

9. SCE intends to file its Charge Ready Phase 2 application proposing a significant expansion of the Charge Ready Pilot in the second quarter of 2018, which the Commission may not approve until late 2019.

10. SCE did not file the PFM within one year of the Charge Ready Phase 1 decision's (D.16-01-023) effective date, January 14, 2017, because actual program costs that would be incurred and budget needs were unknown to the Company on that date, and the Company had not yet obtained results of the Pilot program.

11. SCE was not able to file its Charge Ready Phase 2 Application in January 2017 because it had not achieved the milestones required by the Phase 1 decision, specifically the installation of at least 1,000 charge ports or one year of program implementation.

12. In January 2017, SCE's approved Pilot funding was fully committed based on budgeted costs. At that time, SCE had not installed any infrastructure and did not have actual costs for the majority of the approved budget.

13. SCE determined in late 2017 that the funding authorized by D.16-01-023 would be insufficient to enable SCE to continue offering the program benefits to interested customers until such time as a Charge Ready 2 application could be approved.

14. In the Charge Ready Phase 1 Pilot, to date SCE has deployed infrastructure to support 826 charge ports at 53 customer sites, including 424 charge ports (51%) at 33 sites located in disadvantaged communities, significantly exceeding the Pilot's goal of placing 10% of charge ports in disadvantaged communities.

15. SCE plans to complete construction on infrastructure to support a total of 1,066 charge ports by Q2 2018 and reserve any remaining funding for additional sites expected to

support approximately 177 additional ports by mid-2018, within the original Commission-approved budget.

16. Without SCE's Charge Ready program, customers may delay or decline to install necessary EV charging infrastructure during the gap between the Pilot and Phase 2.

17. SCE's requested bridge funding would support the deployment of at least 1,000 additional qualifying charging stations in SCE's service territory at participating long dwell-time locations owned or operated by SCE's non-residential customers where drivers typically leave their cars parked for four hours or more, including workplaces, multi-unit dwellings ("MUDs"), fleets, and destination locations

18. Bridge funding minimizes the risks posed by the gap between phases by continuing to provide infrastructure and rebates to support charging stations in long-dwell locations, including workplaces and multi-unit dwellings.

19. Bridge funding will provide market certainty to promote the needed increase in EV adoption, which in turn improves air quality and reduces GHG emissions.

20. Bridge funding will also allow SCE to avoid stopping and restarting the program. General contractors are not currently dedicating resources to Charge Ready because they cannot rely on a continuous stream of work from SCE projects, which adds additional time to implementation. For example, there may be delay of a few weeks to get general contractor resources because they have to finish existing work prior to deploying resources to work on Charge Ready. Continuation of the program will provide additional certainty to external resources and allow them to quickly execute on customer projects.

21. Program continuity will provide benefits from an operational perspective. Over the past few years, SCE has built internal capabilities in the outreach, assessment, and deployment of charging infrastructure. With the bridge funding, SCE will be able to keep this momentum to efficiently install charging infrastructure rather than retraining employees after significant gaps in time and remobilizing resources that were moved to other projects, which cause unnecessary delays.

22. I have personal knowledge of the facts and representations herein and, if called upon to testify, could and would do so, except for those facts expressly stated to be based upon information and belief, and as to those matters, I believe them to be true.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on March 5, 2018, at Rosemead, California.

/s/ Katie Sloan Moody
Katie Sloan Moody

Appendix C

Declaration of Vincent Weyl

DECLARATION OF
VINCENT WEYL
IN SUPPORT OF THE PETITION FOR MODIFICATION OF
SOUTHERN CALIFORNIA EDISON

I, Vincent Weyl, Vice-President of Marketing at Kitu Systems, Inc., declare and state:

I am a contractor/vendor in the Southern California Edison Charge Ready Pilot Program.

In the course of Phase 1 of the Charge Ready Program, we have observed faster than anticipated driver adoption, in particular at workspace charging sites. In fact, at least two of our customers realized they did not deploy enough stations to meet peak demand, and one of them is actually limiting the charging time to two hours, resulting in a downgraded driver experience. Both customers are currently unwilling to proceed to expansion of their charging infrastructure after expiration of Phase 1 incentives, but they would reconsider if and when similar incentives become available.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on February 27, 2018 at San Diego, California.

Vincent Weyl

A handwritten signature in blue ink, appearing to read 'Weyl Vincent', written over a horizontal line.

Appendix D

Declaration of ChargePoint, Inc.

DECLARATION OF
CHARGEPOINT, INC.
IN SUPPORT OF THE PETITION FOR MODIFICATION OF
SOUTHERN CALIFORNIA EDISON

I, David L. Packard on behalf of ChargePoint, declares and states:

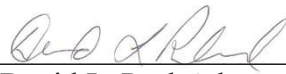
I am a contractor/vendor in the Southern California Edison Charge Ready Pilot Program.

ChargePoint supports Southern California Edison's (SCE) Petition for Modification (PFM) in order to seek the continuation of the Charge Ready program. As a vendor in the program, ChargePoint has direct experience in engaging with customers and has realized the impact of lack of funding certainty due to incentive timelines. The temporary termination of this program has led to challenges in customer engagement and could impact overall program success. Negative customer experience in the Charge Ready pilot can have long term market implications that could impact future programs.

We believe SCE's PFM would address these challenges and provide some certainty for both vendors as well as customers in the market. In particular, having funding certainty allows vendors, like ChargePoint, to confidently spend the resources needed to support the pilot. This, alongside the ratepayer investments and customer participation, is what helps build a successful program.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on February 28, 2018 at Campbell, California.



David L. Packard
Vice President, Utility Solutions
ChargePoint, Inc.