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BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking to
Continue the Development of Rates
and Infrastructure for Vehicle
Electrification.

Rulemaking 18-12-006

**ADMINISTRATIVE LAW JUDGE'S RULING ADDING STAFF PROPOSAL FOR
A DRAFT TRANSPORTATION ELECTRIFICATION FRAMEWORK TO THE
RECORD AND INVITING PARTY COMMENTS**

Background

The Commission issued an order instituting rulemaking (OIR) creating the instant proceeding on December 19, 2018. One of the purposes of the OIR is to continue the implementation and administration of transportation electrification programs, tariffs, and policies at the Commission. Among other things, the OIR authorized the Commission's Energy Division to develop a report outlining a framework for utility transportation electrification investments moving forward, in addition to continuing the Commission's focus on advancing vehicle-grid integration.

The assigned Commissioner filed a scoping memo and ruling (scoping memo) in this proceeding on May 2, 2019. The scoping memo established the consideration of a draft Transportation Electrification Framework (TEF) within the scope of this proceeding. The scoping memo held that the draft TEF was to address a multitude of issues related to utility investments in transportation electrification, including establishing targets

specific to certain state policy goals, cost-effectiveness metrics, marketing, education, and outreach efforts, and rate design principles.¹ The draft TEF was to be prepared by Energy Division and submitted for party review and comment, with the aim of holding a workshop and finalizing a TEF for Commission approval in the first quarter of 2020.²

1. Draft TEF

The draft TEF attached to this ruling for party review and comment is also incorporated into the record of this proceeding. Energy Division will host several workshops focused on separate portions of the draft TEF. Some TEF sections, such as Section 3.2 on Scorecards, Targets, Metrics, and Reporting Requirements, will have its own workshop before final party comments on that section of the draft TEF is due. Some sections of the TEF, such as the section on Rates, do not have a scheduled workshop associated with them. That said, Energy Division is authorized to modify the workshop schedule if, after reviewing party comments, they find it appropriate. Should Energy Division determine changes to the schedule provided below are necessary, parties to this proceeding will receive notice no later than 14 calendar days prior to any modifications taking effect, including any additional workshop(s) or new comment period(s) being held.

Parties are asked to serve and file comments on the draft TEF by TEF section on a rolling basis. In other words, parties are asked to only file and serve comments on certain portions of the draft TEF at a time. This is intended to

¹ Scoping memo at 2-5.

² Scoping memo at 14.

amortize the workload for parties and Commission staff in reviewing a staff proposal of this size.

The following schedule should be used by parties to plan their review on comment on the draft TEF.

Action	Date
Opening Comments on Investor-Owned Utility (IOU) Transportation Electrification Plan (TEP) Development, IOU Roles, and Near-Term Investment Priorities (Sections 3.1, 4, and 5)	February 25, 2020
Workshop on IOU TEP development, IOU Roles and Near-Term Investment Priorities (Sections 3.1, 4, and 5)	March 12, 2020 (At Commission headquarters in San Francisco, Courtyard Room)
Reply Comments on Sections and 3.1, 4, and 5	March 26, 2020
Opening Comments on Scorecards, Targets, Metrics, and Reporting Requirements (Section 3.2)	April 9, 2020
Workshop on Scorecards, Targets, Metrics, and Reporting requirements (Section 3.2)	May 6-7, 2020 (At Commission headquarters in San Francisco, Courtyard Room)
Reply Comments on Section 3.2	May 20, 2020
Opening Comments on Safety, Technology, and Standards due (Sections 7 and 8)	June 4, 2020
Workshop on Safety, Technology, and Standards (Sections 7 and 8)	June 16, 2020 (At Commission headquarters in San Francisco, Courtyard Room)
Reply Comments on Sections 7 and 8	June 30, 2020

Action	Date
Opening Comments on Equity, Rates, Cost Recovery, Alternative Financing, Partnerships, VGI, ME&O, and Emerging Trends (Sections 6, 9, 10, 11, and 12)	July 14, 2020
Reply Comments on Sections 6, 9, 10, 11, and 12	July 28, 2020
Proposed Decision Adopting TEF	October 2020
Decision Adopting TEF	December 2020

At this time, it is not anticipated that a subsequent draft of the TEF will be submitted for party review. Instead, parties should expect the Commission to adopt a final TEF on the basis of the draft TEF attached to this ruling, oral comments made at each workshop, and written comments provided by the parties. The final TEF adopted by the Commission should be used by the investor-owned electric utilities as guidance to develop their strategic TEPs.

Due to the number and complexity of issues addressed in the draft TEF, the Commission may break its final guidance into multiple decisions. Any initial decision(s) would prioritize providing the IOUs guidance necessary to begin developing their TEPs.

2. Party Comments Should be Organized by TEF Questions and Recommendations

In order to expedite the Commission’s review of party comments on the draft TEF, parties shall organize their comments by the questions and recommendations that appear in the TEF. To the extent parties wish to comment on TEF elements that are not responsive to a question or relevant to a recommendation, such comments are welcome bearing in mind the page limit for

party comments, and should be organized by the section to which they are most responsive.

For example, Section 9 of the TEF concerns electric vehicle rates. At the beginning of Section 9 is a box entitled “Questions for Stakeholders” that lists as Question 1: “To what extent should [investor-owned utilities] collaborate on rate design and related customer education efforts across service territories?” If a party wished to comment on this topic, then it would answer it in a section of its comments entitled “Section 9, Question 1.”

Furthermore, the sixth staff recommendation at the end of Section 9.1 of the TEF is “Explore means of using rate design and/or customer bill credits to offset the cost of public charging for customers who do not have access to low residential off-peak charging rates.” If a party wished to comment on that recommendation, then it would comment on it in a section of its comments entitled “Section 9.1, Recommendation 6.”

Finally, if a party wished to submit comments on Section 9 of the TEF that were not responsive to a particular question or staff recommendation, then it would place do so in a section of its comments entitled “Section 9, General Comments.”

3. Page Limits

Each round of written party comment is subject to a page limit. Parties shall ensure that each opening round of written comment is limited to 25 pages. Parties shall ensure that each reply round of written comment is limited to 10 pages.

4. Open Proceedings

The draft TEF incorporates background related to open transportation electrification proceedings before the Commission to provide context for issues

that are addressed within the draft TEF. Comments on the draft TEF, however, are not an appropriate venue for parties to contest or attempt to influence the current direction of open transportation electrification proceedings. Parties should avoid litigating open proceedings in their comments on the draft TEF.

IT IS RULED that:

1. The attached draft Transportation Electrification Framework (TEF) is incorporated into the record of this proceeding.
2. Parties shall file and serve comments on the draft TEF on a rolling basis in accordance with the schedule established in this ruling.
3. Parties shall organize their comments by the questions and recommendations that appear in the draft TEF.
4. Parties shall ensure that each opening round of written comment is limited to 25 pages.
5. Parties shall ensure that each reply round of written comment is limited to 10 pages.

Dated February 3, 2020, at San Francisco, California.

/s/ PATRICK DOHERTY

Patrick Doherty
Administrative Law Judge