



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

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

Rulemaking 18-12-006
(Filed December 13, 2018)

**LOCAL GOVERNMENT SUSTAINABLE ENERGY COALITION
REPLY COMMENTS ON PROPOSED DECISION**

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For THE LOCAL GOVERNMENT
SUSTAINABLE ENERGY COALITION

June 28, 2021

As discussed in its Comments on Proposed Decision, the Local Government Sustainable Energy Coalition (LGSEC) is keenly interested in ensuring that local and tribal governments are treated commensurately with the investor-owned utilities (IOUs), particularly on issues that touch on resiliency, a core function of these public administrations. In that respect, LGSEC strongly opposes Pacific Gas and Electric Company's (PG&E) and the Alliance for Transportation Electrification's¹ (Alliance) misguided attempt to weaken Proposed Decision Ordering Paragraph (OP) 1 as containing a "technical error." Instead, as LGSEC recommended in its Comments, the California Public Utilities Commission (CPUC) should expand on this order, creating a proper platform for respectful IOU and local government (LG) collaborations.

OP 1 requires that any future IOU TE investment proposal,

[d]emonstrate that the electrical corporation coordinated with more than one CBO during the development of the proposal and has the support of local/regional/tribal governments during program implementation.²

PG&E asserts that IOUs would be unable to demonstrate support "during program implementation" because such encouragement could only be evidenced once the programs are in process and recommends deleting "...and...implementation." LGSEC believes that the proper correction would be to insert "prior to and" before "during." Such an approach would reiterate the need for the IOUs to first demonstrate their support before project implementation, as detailed in their advice filings or other procedural documents, and that this support does not sour as a result of poor IOU implementation, as described in after-the-fact measurement and evaluation reports.

¹ INITIAL COMMENTS OF THE ALLIANCE FOR TRANSPORTATION ELECTRIFICATION ON THE PROPOSED DECISION SETTING NEAR-TERM PRIORITIES FOR TRANSPORTATION ELECTRIFICATION INVESTMENTS BY THE ELECTRICAL CORPORATIONS, pages 4 and 5.

² PD, page 32.

The Alliance, of which PG&E is a member, raises a similar concern, going so far as to state that “the proposal would appear to give veto power to one or more of these entities simply by withdrawing their support.”³ It is unclear in what situation an LG would unilaterally remove their backing for a project or pilot in which the IOU was supposed to engage them in, and secure such validations, early in its development. The LG would have to be substantially unhappy to take the necessary steps to obtain a vote from its governing body in an attempt to “veto” in-process investments. In such an event the ability to exercise a “veto” would seem merited. In any event, the risk of such an outcome is small, both in terms of the potential action and affect, and should not be used to impede proper IOU engagement with LGs.

PG&E’s and the Alliance’s fear of working with local and tribal governments might be allayed if they actually worked with them. In this vein, rather than dialing back on appropriate requirements for consultation and engagement, LGSEC recommends that the following additional order be added to the PD:

The IOUs should sponsor a series of workshops, funded through ratepayer dollars, led by local and/or tribal governments or their representatives, which examine how LGs and IOUs can best work together on planning for transportation electrification and associated resiliency efforts, leading to transparent identification of communication and data sharing protocols, coordination activities, mitigation measure development processes, and funding channels. Such an effort should result in a tractable platform for use across local, IOU, and state energy and environmental resiliency-related decision-making systems.

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Respectfully submitted,

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³ Alliance, page 5.