

DOCKETED

Docket Number:	16-TRAN-01
Project Title:	SB 350 Transportation Electrification (Publicly Owned Utilities)
TN #:	214490
Document Title:	Comment RE: Incorporationg Transportation Electrification in Publicly Owned Utility Integrated Resource Planning
Description:	N/A
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Submitter Role:	Public
Submission Date:	11/15/2016 9:35:00 AM
Docketed Date:	11/15/2016

CEC Workshop October 5 2016:
Re: Incorporating Transportation Electrification in Publicly
Owned Utility Integrated Resource Planning
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Comment submitted by Sue Hall, CEO of Climate Neutral Business Network, CNBN.

- CA utilities have recently been raising questions regarding how the GHG impacts associated with the kWh delivered to EV transportation/charging networks could be better accounted for under CA cap/trade system. Marvin from LADWP proposed one solution today with a 4:1 allowance allocation: many other speakers referenced the GHG accounting between utility and transportation sectors as a challenge that needs to be addressed.
- One option to consider — which would parallel the innovative approach already in place in WA state under its new Clean Air Rule — would be for utilities and other EV infrastructure investors to be given ownership of the full suite of GHG reductions delivered by EV charging as “domestic” CA credit projects (including fuels GHG displacement)
- Double counting under the cap would be avoided by allowing such EV charging domestic credits to draw upon the underutilized renewable set aside reserve already established in the CA cap/trade system.
- This approach would provide appropriate carbon capital incentives to drive EV charging investments — by both utilities directly and their other private and public partners — channeling these new carbon incentives to the entities which are putting their own investment capital at risk to achieve these GHG reductions (both utilities and their partners). This approach would therefore meet utilities’ interests to expand new funding resources to accelerate EV charging deployment/education — and meet their aggressive GHG goals which will require partners’ EV investment resources beyond just their own!
- Building upon the business case which GM sponsored, CNBN has been discussing these kinds of creative solutions with many stakeholders including members from the newly formed EV Charging Carbon Coalition, the EVCCC — including Audi/VW Group, EVgo, Exelon, CT Green Bank, Siemens and CNCA cities.
- The EVCCC has already developed a very compelling carbon business case arising from such EV charging carbon credits -- and so is now developing a new voluntary VCS carbon market methodology for EV charging. This new credit methodology could also provide a basis upon which such domestic CA EV charging credits could be certified in both the CA cap/trade and the US/international voluntary markets.
- We would therefore welcome further discussion of this creative avenue to see how it could best be shaped to address the cap/trade allowance concerns which utilities were recently raising -- in ways that would maximize investment in EV charging solutions which are so mission critical to utilities’ long-term GHG and EV transportation goals.