

## DOCKETED

<b>Docket Number:</b>	17-IEPR-07
<b>Project Title:</b>	Integrated Resource Planning
<b>TN #:</b>	219200
<b>Document Title:</b>	CalETC Comments Re Light-Duty Plug-In EV Calculator Tool for POU IRPs
<b>Description:</b>	N/A
<b>Filer:</b>	System
<b>Organization:</b>	CalETC
<b>Submitter Role:</b>	Public
<b>Submission Date:</b>	6/16/2017 2:46:06 PM
<b>Docketed Date:</b>	6/16/2017

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*Submitted On: 6/16/2017*

*Docket Number: 17-IEPR-07*

**CalETC Comments Re Light-Duty Plug-In EV Calculator Tool for POU IRPs**

*Additional submitted attachment is included below.*



June 16, 2017

California Energy Commission  
Dockets Office, MS-4  
Re: **Docket No. 17-IEPR-07**  
1516 Ninth Street  
Sacramento, CA 95814-5512

**Re: Light-Duty Plug-In Electric Vehicle Calculator Tool for Publicly Owned Utility Integrated Resource Plans**

The California Electric Transportation Coalition (CalETC) appreciates the opportunity to comment on the California Energy Commission's (CEC's) light-duty plug-in electric vehicle calculator tool for Publicly Owned Utility (POU) Integrated Resource Plans (IRPs).

CalETC is a non-profit association promoting economic growth, clean air, fuel diversity and energy independence, and combating climate change through the use of electric transportation. CalETC is committed to the successful introduction and large-scale deployment of all forms of electric transportation including plug-in electric vehicles of all weight classes, transit buses, port electrification, off-road electric vehicles and equipment, and rail. Our board of directors includes: Los Angeles Department of Water and Power, Pacific Gas and Electric, Sacramento Municipal Utility District, San Diego Gas and Electric, Southern California Edison, and the Southern California Public Power Authority. Our membership also includes major automakers, manufacturers of zero-emission trucks and buses, and other industry leaders supporting transportation electrification.

We support the efforts of the CEC to promote the adoption of zero-emission vehicles (ZEVs) and equipment. Although California is leading the nation in ZEV adoption, our state still has a long way to go to reach the goals in the Governor's Executive Order B-16-2012: 1.5 million ZEVs on California roads by 2025 and zero-emission vehicle infrastructure able to support 1 million vehicles by 2020. In addition, the state must implement SB 1275 (De León, 2014) and SB 1204 (Lara, 2014), which set targets for the deployment of 1 million zero- and near-zero-emission vehicles by 2023, access to these vehicles by disadvantaged and low- and moderate-income communities, and deployment of zero- and near-zero-emission medium- and heavy-duty vehicle technologies.

As pertinent to the Integrated Resource Planning process, SB 350 (De León) [Chapter 547, Statutes of 2015] authorizes utilities to implement transportation-electrification programs and investments, and recognizes the need for widespread transportation electrification in order to reach many of the state's goals, such as reducing petroleum use, meeting air-quality standards, improving public health, and achieving greenhouse-gas emissions reductions. Achieving widespread electrification will require state agencies, automakers, third-party charging providers, electric utilities, and a broad coalition of stakeholders to work collaboratively to advance the market for plug-in electric vehicles (PEVs). We support the CEC's efforts to develop this tool to quantify the specific reductions in climate and air-pollutant emissions resulting from increased transportation electrification.

CalETC, in coordination with our member POUs, the Electric Power Research Institute (EPRI), and Chuck Shulock (an independent consultant), did an initial review of the light-duty plug-in electric vehicle calculator tool. We echo the comments on the tool submitted by Los Angeles Department of Water and Power (LADWP) and Sacramento Municipal Utility District (SMUD).

We offer the following recommendations for refinement of the tool, based on our initial review:

- Although the introduction tab states that the default assumptions used for powerplant emissions of NO<sub>x</sub> and PM<sub>2.5</sub> are based on GREET 2.0, the tool instead substitutes the South Coast Air Quality Management District permit levels. Those inputs cause the tool to show an increase in PM<sub>2.5</sub>, when there should be a decrease in PM<sub>2.5</sub> associated with greater levels of transportation electrification.
- All powerplant emissions assumptions should take into account the state Renewable Portfolio Standard, and be decreased over time to be more representative of future energy resources.
- We recommend that instructions, definitions, sources, methodologies, conversions, and assumptions be clearly stated and explained in a centralized location to assist POUs with determining which inputs will need to be adjusted to take into account their unique service territory/emissions characteristics.

In addition, we request additional time to more deeply review the revised version of this tool, once posted, then meet with staff to provide detailed feedback to ensure that the final version will be accurate and assist the POUs with their IRP planning process. We appreciate staff's efforts to develop this tool and believe the tool will be useful for the POUs as they plan for transportation electrification in their service territories and develop their IRPs.

Thank you for your consideration; we look forward to continuing to work with CEC staff to refine this useful tool. Please do not hesitate to contact me should you have any questions.

Sincerely,



Hannah Goldsmith, Project Manager  
California Electric Transportation Coalition

cc: CEC Technical Leads: Paul Deaver; Gary Yowell; Michael Sokol