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| **Docket Number:** | 18-HYD-01 |
| **Project Title:** | Executive Order B-48-18 Workshops |
| **TN #:** | 223422 |
| **Document Title:** | Rhodium Group - Better tools to predict local EV sales use |
| **Description:** | for efficient EVI deployment and real-time evaluation of incentive program |
| **Filer:** | System |
| **Organization:** | Rhodium Group/Kate Larsen |
| **Submitter Role:** | Public |
| **Submission Date:** | 5/11/2018 1:33:57 PM |
| **Docketed Date:** | 5/11/2018 |

*Comment Received From: Kate Larsen*
*Submitted On: 5/11/2018*
*Docket Number: 18-HYD-01*

## Better tools to predict local EV sales/use for efficient EVI deployment and real-time evaluation of incentive program effectiveness

I am submitting this comment on behalf of the Rhodium Group (a leading independent research provider that combines economic data analytics and policy insight to provide insights into global and local trends).

As the California Energy Commission and other state and local entities across California work to meet the Governor's goals laid out in EO B-48-18, it will be increasingly important to ensure those efforts and resources are used efficiently and effectively to maximize EV penetration and use. Because these efforts are at very early stages, there is less need for tools that provide maximum precision on the exact location (i.e., at the zip code, census tract or even household level) of future EV sales and charging use. But as those efforts proceed and the initial barriers to EV deployment are overcome, it will be increasingly important to base decisions on hyper-local estimates to guide investment decisions. It will also be critical to be able to use empirical data to assess and evaluate the effectiveness of programs funded by EO B-48-18 to meet state and local goals of targeting disadvantaged and low income communities. Most current information and projections rely on data that is several years out of date by the time it is available. Real-time data on EV sales and charging behavior will be critical to providing relevant and up-to-date assessments of progress and effectiveness.

An explosion of new econometric research and big data tools now allow the kind of hyper-local assessments and projections that would be necessary to provide local and state officials with the tools to ensure more effective and nimble EV infrastructure development.

We recommend that the CEC and affiliated entities plan ahead for this need by investing in the types of analytical tools that will ensure these tools are available.

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