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January 5, 2010

Ms. Leslie Baroody, EV Team Leader
California Energy Commission
Dockets Office
1516 Ninth Street
Sacramento, CA 95814

RE: 2011-2012 Investment Plan, Docket Number 10-ALT-1

Dear Ms. Baroody:

I am writing on behalf of the Southern California Association of Governments (SCAG) to provide input on the 2010/2011 Investment Plan for the Alternative and Renewable Fuel and Vehicle Technology Program. Specifically, I urge the California Energy Commission (CEC) to support ongoing statewide regional Electric Vehicle (EV) charging infrastructure planning efforts through the budget allocation for Market and Program Development: Technical Assistance and Environmental/Market/Technology Analyses.

Southern California has been chosen by the manufacturers of plug-in electric vehicles to be an initial market launch site beginning the first quarter of 2011. To ensure an appropriate level of public charge port infrastructure, charge stations need to be spread strategically across the region. To achieve this goal, regional planners need to complete a planning study to evaluate and document how charging stations would best be sited at public, commercial and workplace locations. A planning study would provide Southern California specific information that can also contribute to a statewide effort to define a state PEV infrastructure system and can serve as a template for other regions with high EV penetration throughout California.

SCAG applauds the California Energy Commission for its work to date funding EV driver behavioral survey/studies and technology assessments in conjunction with UC Davis, as well as the approximate \$10 million to update existing infrastructure to current plug standards statewide. These critical efforts will serve to meet the infrastructure demands of the state and of Southern California over the next several years. However, looking to the future, Southern California Edison has projected that approximately 73,000 EV's will be in operation throughout Southern California by the end of 2014 and close to 450,000 by 2020. This expected dramatic increase in the number of EVs requires immediate action to address region specific plans on smart infrastructure investment.

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In order to address Southern California's planning needs, SCAG is developing an EV infrastructure study in conjunction with key regional Councils of Governments, public and private electric utilities, South Coast Air Quality Management District, Metropolitan Transportation Authority, Ventura Transportation Commission, Los Angeles County and stakeholders from EV industry clusters. As SCAG moves its study process forward, it will develop regional plug in vehicle charge port infrastructure priorities and planning recommendations that will balance public, commercial and residential charging locations. Specific components of the proposed study would include:

1. **EV Market Assessment** - Building on the work that has been completed by SCE that utilized over 20 sources, including OEM launch announcement, stimulus funding for battery factories and consulting studies, this task will develop a precise projection of the size of the electric vehicle market, specifically identifying the percentage of plug-in hybrid (PHEV) versus battery electric vehicles (BEV).
2. **Literature Review** – Making use of existing data, SCAG would develop a summary document which includes a review and analysis of existing studies from CEC, NREL, DOE and other early movers statewide and nationally to identify information needed in order to accomplish the goals and objectives of this study. This step is necessary in order to avoid duplication of previous efforts and to maximize the use of available data, while at the same time identifying information gaps.
3. **Consumer Behavioral Analysis** - Knowledge of customer behavior is critical to the establishment of a viable charge port infrastructure system. This study will utilize information available from previous studies executed by EPRI and the National Labs to determine potential PEV driving patterns. This will include data obtained from the ARRA funded project in San Diego and Los Angeles, a study that will track the driver patterns of over 1,000 Nissan Leaf owners in these regions.
4. **Subregion Case Study** – In order to test the assumptions in the previous tasks SCAG would develop a detailed model based on real world conditions of representative urban and suburban subregions. The objective will be to build on the work of the South Bay Council of Government which has been studying the impact electric vehicle use on travel patterns and infrastructure models to support vehicle use patterns. SCAG would include other subregions in the study to test assumptions under diverse development patterns represented in Southern California.

5. **Regional Infrastructure Development Road Map and Policy Recommendations** – Using information developed in the previous tasks, SCAG will develop a detail set of deployment recommendations for plug-in vehicle charge port infrastructure. The recommendations will define regional locations for construction of charging infrastructure that will meet the needs of the PEV consumers. In addition, the recommendations will define the quantity of charger locations and chargers per location based on market projections for 2014 and 2030.

As the CEC moves forward in developing a statewide plan, it is important to facilitate planning on a regional level. Statewide infrastructure, which is key to the success of the adoption of EVs into the automobile market, can benefit from the detail and specific regional knowledge of those provided by Metropolitan Planning Organizations in California. Regional and statewide planning are complimenting efforts, so SCAG urges the CEC to provide financing to ongoing regional planning efforts across the state as a means to ensure appropriate deployment of infrastructure in key EV markets.

SCAG appreciates the opportunity to provide input into the 2010/2011 Investment Plan for the Alternative and Renewable Fuel and Vehicle Technology Program. We look forward to partnering with the CEC to develop smart clean energy transportation planning in Southern California.

Sincerely,

A handwritten signature in black ink, appearing to read 'Hasan Ikhata', with a large, stylized loop at the end.

Hasan Ikhata
Executive Director