

**DOCKETED**

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*Comment Received From: Hannah Goldsmith  
Submitted On: 6/8/2018  
Docket Number: 18-EVI-01*

**CalETC Comments on Staff Report & Workshop on CA Plug-in Electric Vehicle Infrastructure Projections: 2017-2025**

Please find our comments attached.

*Additional submitted attachment is included below.*



June 8, 2018

California Energy Commission  
1516 9th St.  
Sacramento, CA 95814  
**Docket: 18-EVI-01**

*Submitted via online docket*

**Re: Staff Report and Staff Workshop on the California Plug-in Electric Vehicle Infrastructure Projections: 2017-2025**

The California Electric Transportation Coalition (CalETC) appreciates the opportunity to provide comments on the California Energy Commission's (CEC's) Staff Report and Staff Workshop on the California Plug-In Electric Vehicle Infrastructure Projections: 2017-2025 (EVI Pro).<sup>1</sup>

CalETC supports and advocates for the transition to a zero-emission transportation future as a means to spur economic growth, fuel diversity and energy independence, ensure clean air, and combat climate change. CalETC is a non-profit association 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.

Although California is leading the nation in zero-emission vehicle (ZEV) adoption, our state still has a long way to go to reach the goals in the Governor's Executive Order B-48-18: 5 million ZEVs on California roads by 2030 and specified levels of zero-emission vehicle infrastructure by 2025 to support the transition to these vehicles. In addition, the state must implement SB 1275 (De León) [Chapter 530, Statutes of 2014] and SB 1204 (Lara) [Chapter 524, Statutes of 2014], which set targets for the deployment of 1 million zero- and near-zero-emission vehicles by 2023, access to

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<sup>1</sup> Staff Report: Bedir, Abdulkadir, Noel Crisostomo, Jennifer Allen, Eric Wood, and Clément Rames. 2018. *California Plug-In Electric Vehicle Infrastructure Projections: 2017-2025*. California Energy Commission. Publication Number: CEC-600-2018-001. Staff Workshop on May 23, 2018.

these vehicles by disadvantaged and low- and moderate-income communities, and deployment of zero- and near-zero-emission medium- and heavy-duty vehicle technologies.

On behalf of the three large investor-owned utilities (IOUs), Southern California Edison, San Diego Gas & Electric, and Pacific Gas & Electric, CalETC respectfully submits the following comments on the Staff Report and EVI Pro model and tool.

The IOUs appreciate the ability to provide comments, but request staff consider additional time, workshops, or meetings to work through the following issues.

Model use and updating:

- The IOUs would appreciate a better understanding of how the model will be used. Specifically, there is a concern that the State of California could rely solely on this model for sizing and approving utility programs, influencing legislation, or prescribing optimal deployment of infrastructure; when alternate assumptions and inputs should also be considered.
- To that end, the IOUs would like a better understanding of differences between and potential use of results from the Staff Report and the EVI Pro Lite tool.
- Given the model's potential to influence infrastructure deployment in California, the IOUs would appreciate understanding the CEC's plans to maintain the model, review the assumptions, and update the results.

Model development:

- The IOUs request additional time to contribute to the development of the model and its assumptions. Additional time would allow the IOUs to complete a more detailed analysis, and go over several assumptions (e.g., load shapes, home charging speeds, home charging adoption, vehicle composition, charging patterns, charger power, etc.) with staff.
- The IOUs also request to review assumptions and inputs in the model, so that they may provide substantive comments. A deeper dive into the model and inputs would allow the IOUs to understand how it was developed and get a deeper understanding of how it functions. This would allow for better feedback.

Model functionality and output:

- The IOUs are concerned about EVI Pro and the Staff Report's reliance on the California Air Resources Board's *Clean Technologies and Fuels Scenario* and functional limitations to scaling infrastructure needs to accelerate adoption scenarios.

To address the comments above, the IOUs respectfully request an extension of at least one month to provide in-depth comments on EVI Pro and meet with CEC staff to review the details of the model itself. After this further analysis and review, the IOUs are confident they will be able to provide substantive feedback.

Thank you for your consideration of our comments. Please do not hesitate to contact me, at [hannah@caletc.com](mailto:hannah@caletc.com) or (916) 551-1943, if you have any questions.

Sincerely,

A handwritten signature in blue ink that reads "Hannah Goldsmith". The signature is written in a cursive style with a large initial "H" and "G".

Hannah Goldsmith, Project Manager  
California Electric Transportation Coalition

cc: Kadir Bedir  
Noel Crisostomo  
Jennifer Allen  
Eric Wood  
Clément Rames