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*Comment Received From: Catherine Hackney*  
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**SCE Comments on EV Charging Infrastructure Assessment Workshop**

*Additional submitted attachment is included below.*



**Catherine Hackney**  
Director, Regulatory Affairs

March 29, 2019

California Energy Commission  
Docket Office, MS-4  
Re: Docket No. 19-IEPR-04  
1516 Ninth Street  
Sacramento, CA 95814-5512  
docket@energy.ca.gov

Re: Southern California Edison Company's Comments on the California Energy Commission Docket No. 19-IEPR-04: Electric Vehicle Charging Infrastructure Assessment (AB 2127)

Dear Commissioners:

On March 11, 2019, the California Energy Commission (CEC) held a staff workshop on the Electric Vehicle Charging Infrastructure Assessment (AB 2127) as part of the 2019 Integrated Energy Policy Report (IEPR) Proceeding (Workshop). The Workshop considered the proposed process for assessing charging infrastructure needs as part of AB 2127's implementation. Southern California Edison (SCE) recognizes that the assessment is necessary to support the development of a comprehensive electric vehicle (EV) forecast at the CEC and appreciates the CEC's efforts to engage stakeholders early in the process to provide transparency into the methodology, terminology and data sources that will be used for the collecting data on charging infrastructure needs. SCE's comments on the Workshop include: a recommendation to enhance the features of the EVI-Pro and EVI-Pro Lite Tools, support for standardizing terminology and developing common definitions, and provide information about the transportation electrification work in disadvantaged communities within SCE's territory.

I. Recommendations to Enhance the Features of the EVI-Pro and EVI-Pro Lite Tools

SCE appreciates that tools, such as EVI-Pro and EVI-Pro Lite, must navigate the complexity of estimating charging infrastructure needs, considering the challenging nature of driving behavior and changing technologies that consumers may adopt. SCE supports the continued development of this suite of tools and recommends developing additional features. The following recommended enhancements to the tools, if developed and shared with others, may help to advance charging infrastructure deployment in the investor-owned utility (IOU) territories and improve stakeholder use and engagement:

- Provide a comprehensive list of assumptions and data utilized to derive the results of the EVI-Pro Model. SCE recommends frequent updates to the data sets based on EV sales and technological developments.
- Expand the tool to provide the geographic location of EVSE infrastructure and to include existing infrastructure deployed.
- Include an ability to run additional sensitivities that are core to the EVI-Pro model (i.e., maximization of eVMT, load management, etc.)
- Provide load profiles for various vehicle classes and charging infrastructure types and scenarios.

IOUs would benefit from the use of EVI-Pro for long term EVSE planning through the CEC's continued development of these tools, frequent updates to assumptions (with stakeholder engagement), and data collection.

## II. Support for Standardizing Terminology in Addressing Charging Infrastructure Needs in the EV Market

The workshop on AB 2127 proposed standardizing terminology and developing common definitions, which SCE finds useful in planning for future charging infrastructure needs in the EV market. For example, SCE supports developing an easy to understand the definition of standardized and listed charging connectors for all on-road market segments as defined through SB 350. Standard connectors will simplify reporting out future electrification progress and will reduce complexity and enhance safety for EV users. Standardizing the terminology around charging infrastructure will help to minimize confusion now and in the future.

Common definitions are needed, furthermore, to familiarize participants and grow the market. For example, terms like "charging station" and "charging ports" are often used interchangeably. Terms such as "make readies" are difficult to quantify, as their physical attributes change by charging level size, number of ports and by manufacturer. Finally, market sectors such as those for passenger vehicles, transport, on-road, and off-road—and the standards needed to serve these sectors—must be defined in order to report effectively on electrification successes. Clear definitions will help market participants, users and government entities report on the value of the infrastructure installed. SCE is interested in helping the CEC with this effort.

## III. Improving TE Opportunities in Disadvantaged Communities

Targeting TE investments in disadvantaged communities (DACs) are a key focus in all of SCE's transportation electrification programs. For instance, in the Charge Ready Transport program, 40 percent of budget is allocated to serving the Medium and Heavy Duty vehicle transportation market, is allocated to DACs. For Light Duty vehicles, SCE has proposed 30 percent budget spend for DACs in the Charge Ready program. As of the end of the fourth quarter in 2018, in the Charge Ready Program Pilot, 48% of the committed charge ports are located in DACs, which is considerably higher than the Pilot's requirement to deploy 10% of charge ports in DACs. SCE looks forward to working with stakeholders on addressing EV adoption in DACs and to the assessments' results identifying DAC charging infrastructure needs.

IV. Conclusion

SCE supports the CEC's approach to implementing AB 2127 and makes recommendations for improvements to the EVI-Pro and EVI-Pro Lite tools. The Workshop was an important first step in building consensus among stakeholders on how EV charging infrastructure expansion will impact or increase EV adoptions in California. The CEC should continue to engage stakeholders to build strong connections between the EV forecast development process and the AB2127 implementation process. SCE appreciates the CEC's consideration of these comments and looks forward to its continued partnership with the CEC in the review and development the 2019 EV Forecast. Please do not hesitate to contact me at (916) 441-3979 with any questions or concerns you may have. I am available to discuss these matters further at your convenience.

Very truly yours,

/s/

Catherine Hackney