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*Comment Received From: Manuel Alvarez*
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# SCEâ€™s Comments on the CEC Docket No. 15-IEPR-10: Joint Lead Commissioner Workshop on Inputs and Assumptions for Transportation Energy Demand Forecasts

*Additional submitted attachment is included below.*

SOUTHERN CALIFORNIA EDISON
An EDISON INTERNATIONAL Company

**Manuel Alvarez**
Manager, Regulatory Policy and Affairs

July 8, 2015

California Energy Commission
Docket Office, MS-4
Re: Docket No. 15-IEPR-10
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. 15-IEPR-10: Joint Lead Commissioner Workshop on Inputs and Assumptions for Transportation Energy Demand Forecasts

Dear Commissioner McAllister and Commissioner Scott,

On June 24, 2015, the California Energy Commission (Energy Commission) held a Lead Commissioner Workshop ("Workshop") on the Preliminary Transportation Energy Demand Forecast as part of the 2015 Integrated Energy Policy Report Update (2015 IEPR Update) process. Southern California Edison (SCE) participated in the Workshop and appreciates the opportunity to provide these additional written comments.

As discussed below, SCE's recommend that the Energy Commission use three cases for representing Transportation Electrification (TE) forecasts: (1) a low case, (2) a mid-case (expected scenario) and (3) a high case. For both the mid and high cases, the Energy Commission should use a simple scenario-based analysis in its forecast, and for the low-case, the Energy Commission should continue to use its chosen TEFU forecasting model. In addition, SCE believes it is critical that the Energy Commission's forecasting models reflect California's energy and environmental policy goals, including, but not limited to: the Zero Emission Vehicle (ZEV) Mandate, the Low Carbon Fuel Standard (LCFS), and federal air quality requirements. The Energy Commission should reflect these requirements in the expected mid-case scenario for on-road transportation electrification (TE), rather than continuing to rely on a multi-fuel consumer choice model in the Energy Commission's current expected case.

## A. TEFU Should Only Be Used as the Low Case for On-Road TE

Because the Energy Commission's TEFU does not reflect the light duty EV regulatory environment, it cannot return reasonable results and should therefore only be used as the low case for on-road TE. SCE supports making refinements and updates to the Energy Commission's model and believes the results can be shown in the IEPR, but not as the expected

case. To help refine the model, SCE requests clarification on the assumptions and attributes the Energy Commission used for all TE modeling.

At the June 24 workshop, Energy Commission used the 2013 choice model forecast, which improved upon earlier draft forecasts, but continued to under-estimate kilowatt hour (kWh) usage for electric vehicles. As mentioned in SCE's previous comments to the 2013 IEPR proceeding, the 2013 IEPR estimates 5,200 miles per year per EV. By contrast, SCE estimates roughly 10,000 miles per EV annually.[1] The kWh per EV should be updated accordingly, and should be consistent in the IEPR low, medium and high cases.

**B. The Energy Commission Should Develop Simple Mid Case TE Scenarios for On-Road, Train and Off-Road Segments**

Currently, the Energy Commission, in coordination with Aspen Environmental and UC Davis, plan to develop a simple scenario for off-road TE that incorporates existing and planned government regulations and incentives. SCE recommends a similar approach for the mid-case for light-, medium-, and heavy duty TE as well as trains (the Energy Commission's on-road segment). The Energy Commission should use the mid case as the primary scenario for its future efforts. As SCE presented in an August 21, 2013 IEPR workshop presentation, SCE developed its mid-case scenario for light duty EVs by analyzing and incorporating the results of studies sourced from various industry experts. The Energy Commission's should future forecasting efforts should similarly engage stakeholders including, the California Air Resources Board.

**C. The Energy Commission Should Develop Simple High Case TE Scenarios that Assume the State Achieves its Long Term Climate Goals**

SCE recommends that the Energy Commission develop a high case TE scenario that uses the Vision 2.0 model and other tools to explore how the Governor's 2030 and 2050 climate goals, 2030 petroleum reduction goals and federal air quality requirements can be met for the on-road segment. The high case scenario should include at least one case with a high electrification scenario in most on-road and off-road market segments.

In conclusion, SCE appreciates the Energy Commission's consideration of these comments and looks forward to its continuing collaboration with the Energy Commission. Please do not hesitate to contact me at (916) 441-2369 with any questions or concerns you may have. I am available to discuss these matters further at your convenience.

Very truly yours,

*/s/ Manuel Alvarez*

Manuel Alvarez

[1] *See* SCE Comments on Draft 2013 IEPR filed on October 29, 2013, at p. 26, at: http://www.energy.ca.gov/2013_energypolicy/documents/2013-10-15_workshop/comments/Southern_California_Edisons_Comments_2013-10-29_TN-72296.pdf