

DOCKETED

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Pacific Gas and Electric Company Comments on State, Regional, and Local Planning for Electric Vehicle Infrastructure Investment

Additional submitted attachment is included below.

December 31, 2015

**VIA E-MAIL DOCKET@ENERGY.
CA.GOV**California Energy Commission
Dockets Office, MS-4
Docket No. 15-ALT-02
1516 Ninth Street
Sacramento, CA 95814-5512

Re: Docket 15-ALT-02: Pacific Gas and Electric Company Comments on the Lead Commissioner Workshop on State, Regional, and Local Electric Vehicle Infrastructure Planning and Investment

I. Introduction

Pacific Gas and Electric Company (PG&E) appreciates the leadership of the California Energy Commission (CEC) and California Public Utilities Commission (CPUC) in support of adoption of electric vehicles (EVs) in California. Transforming California's transportation system to meet state climate and clean air goals will require a concerted effort from all parties, and coordination between stakeholders will ensure that utility, state, and private investments will have an impact greater than the sum of their parts. The state has made considerable progress to date, thanks in part to the foundational work funded by the CEC. PG&E strongly supports transportation electrification, and looks forward to helping build on these early successes.

PG&E submits these comments in support of a presentation given by the company at the Lead Commissioner Workshop on State, Regional, and Local Electric Vehicle Infrastructure Planning and Investment, held on December 7, 2015. The following key points are addressed below:

- PG&E proposes to deploy up to 25,000 level 2 charging stations and 100 DC fast chargers (DCFCs) at workplaces, multi-unit dwellings (MUDs), and at public or retail locations, which will help accelerate EV adoption and attainment of the state's transportation and clean air goals.
- Appropriate siting is a critical element of PG&E's proposal, which will be driven by demand from site hosts and facilitated by the groundwork laid by the CEC's EV readiness programs.
- PG&E aims to align EV infrastructure investments to complement existing equity programs as well as existing charging networks.

II. PG&E Will Help Develop the EV Infrastructure Necessary to Meet State Transportation Goals

The Governor has set ambitious targets for zero-emission vehicles (ZEVs) in California, calling for the infrastructure to support 1 million ZEVs by 2020. While EV adoption has surpassed 175,000 vehicles in the state, the charging infrastructure needed to fuel those vehicles has lagged behind, primarily due to the high costs of installing commercial EV charging stations. PG&E recognizes that access to workplace charging and residential charging in multi-unit dwellings (MUDs) is critical to accelerating EV adoption in the near term. To that end, the utility has proposed its Electric Vehicle Infrastructure and Education Program.

PG&E's program proposal, currently under review by the CPUC, requests to deploy up to 25,000 level 2 charging stations at workplaces, MUDs, and at public or retail locations. An additional network of 100 DC fast chargers (DCFCs) would support inter-regional travel in PG&E's service territory. The utility has committed to siting 10 percent of the proposed charging infrastructure in disadvantaged communities, and would set aside funds for additional vehicle equity programs to increase access to EVs in those communities. PG&E's proposal provides a turnkey installation, in which PG&E would install and own the charging stations at customer sites, procuring equipment and contracting network services from companies in the EV charging services industry. PG&E's deployed infrastructure would also create a platform for future "smart-charging" capabilities. Phase 1 of the program would deploy 10 to 30 percent of the total infrastructure over two to three years. PG&E expects a proposed decision from the CPUC by June of 2016.

Thoughtful and efficient siting of charging infrastructure will be critical to program success. PG&E sees three primary factors in siting: cost, utilization, and policy objectives. Under each of these general areas is a more complex variety of elements which may be considered when evaluating interested site hosts or marketing the program. Nonetheless, market demand from site hosts will drive and shape program siting approaches, so flexibility will be critical as PG&E begins to deploy infrastructure under the program.

While siting will be a complex and dynamic process, PG&E has the benefit of the investments the Energy Commission has made to date in local and regional PEV readiness. PG&E's program will build on and complement the work completed in the seven regional readiness plans throughout the utility service territory. Regional readiness plans provide an excellent basis for utility outreach efforts to identify potential site hosts. PG&E also plans to seek representation from local EV coordinating councils on the utility's EV Program Advisory Council.

Two additional areas will require concerted coordination between utility and state investments: programs in disadvantaged communities and DCFC deployments. If PG&E's proposal is adopted by the CPUC, PG&E aims to align infrastructure investments with state-funded vehicle equity programs to complement state investments. Similarly, PG&E plans to provide funding to support or expand existing and planned vehicle equity programs. PG&E's DCFC deployments would connect and complement the small but growing network within the state. PG&E is currently leading an EPIC-funded project regarding DCFC siting in collaboration with UC Davis, E3, and PlugShare. The research findings will develop a public tool to help site DCFC deployments based on forecast traffic demand and lowest utility distribution costs.

While PG&E's EV infrastructure investments will play a critical role in moving the state forward, the company also recognizes that this effort will constitute only a portion of what is needed to realize the transition to zero-emission vehicles in California. PG&E looks forward to continued collaboration with the state, private industry, and customers to accelerate and support EV adoption.

III. Conclusion

PG&E appreciates the opportunity to comment on this topic, and commends the CEC for their work to facilitate the adoption of zero-emission vehicles.

Sincerely,

/s/

Jana Corey