

## DOCKETED

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**SCE and the CalETC Comments on CEC Docket No. 17 IEPR-05: Workshop Preliminary Transportation Energy Demand Forecast**

*Additional submitted attachment is included below.*

July 5, 2017

California Energy Commission  
Docket Office, MS-4  
Re: Docket No. 17-IEPR-05  
1516 Ninth Street  
Sacramento, CA 95814-5512  
docket@energy.ca.gov

Re: Southern California Edison Company and the California Electric Transportation Coalition's Comments on the California Energy Commission Docket No. 17-IEPR-05: Workshop Preliminary Transportation Energy Demand Forecast

Dear Commissioners:

On June 20, 2017, the California Energy Commission (Energy Commission) held a workshop to present the preliminary transportation energy demand forecast as part of the 2017 Integrated Energy Policy Report (IEPR) ("the Workshop"). Southern California Edison (SCE) on its own behalf and on behalf of the California Electric Transportation Coalition (CalETC) submits these written Workshop comments.

SCE and CalETC offer several recommendations for improvements to the preliminary forecast – many of which were expressed in comments on past transportation energy demand forecasts from previous IEPR cycles.<sup>1</sup> Among SCE's and CalETC's key concerns are the following:

- In addition to using the current customer choice model for light-duty Electric Vehicles (EVs) as a projected "low-case" scenario, the Energy Commission should include both "medium" and "high" case scenarios in their forecasts that reflect EV forecasts under the long-term transportation and environmental goals of the California Air Resources Board (CARB) and the Governor's office;
- The Energy Commission scenarios for other types of Transportation Electrification (TE), in addition to light-duty EVs, should similarly include three cases: a low-case,

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<sup>1</sup> See SCE Comments filed in the 2015 IEPR Cycle, including SCE's Comments on the November 15, 2015 Workshop.

medium-case, and high-case (the high case should capture longer-term energy, transportation, and environmental goals);

- The Energy Commission should convene an on-going working group, as a sub-group to the Demand Analysis Working Group (DAWG), that focuses on TE data gathering and analysis, and which includes agencies, the transportation industry, automakers, utilities, and other impacted stakeholders;
- The Energy Commission should refer to the Alternative Fuels Data Center or other expert studies that provide more realistic annual electricity consumption for Plug-In EVs to inform their TE forecast.

SCE and CalETC expand on some of these recommendations further, below.

**A. The Energy Commission Should Model Scenarios that Reflect Achievement of California’s 2050 Policy Goals, and Include Specific Plug-In EV Attributes**

As previously recommended in SCE’s November 24, 2015 IEPR Comments on the Transportation Energy Forecast, SCE and CalETC recommend that the Energy Commission model TE scenarios for: (1) a mid-case scenario that incorporates existing and planned governmental regulations and incentives, including, but not limited to, existing and planned CARB regulations, new state legislation as well as federal, state and local incentives; and (2) a high-case scenario that assumes achievement of Governor Brown’s long-term state climate goals for 2050, as well as federal air quality requirements under a variety of fuel and technology mixes, including a high electrification case in most market segments.

Beyond EVs, SCE and CalETC believe the Energy Commission should incorporate additional scenarios into other aspects of TE forecasting as well, so as to ensure that the state’s long-term goals are reflected appropriately in the final Demand Forecast.

**B. The Energy Commission Should Convene a TE Working Group to Inform and Improve TE Forecasting**

In keeping with the June 27, 2017 Joint Utility and Automakers’ Comments<sup>2</sup> and SCE’s December 17, 2015 Workshop comments,<sup>3</sup> SCE and CalETC emphasize the recommendation to convene an on-going stakeholder process to improve EV data for vehicle grid integration (VGI) goals, and other long-term state goals to accelerate EV adoption. It is important for VGI and EV adoption policies to be informed by concrete data, and convening a working group that can assist in gathering and analyzing data can help to better inform policies and update them as new data emerges.

CalETC also recommended such a working group in its December 12, 2016 comments, noting that the Energy Commission should lead an EV data working group to “bring together

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<sup>2</sup> See Joint Utility Automakers Comments on June 13, 2017 Workshop.

<sup>3</sup> See SCE Comments on December 17, 2015 Workshop.

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data experts and compare and understand existing data, and determine what gaps need to be addressed.” CalETC offered potential sources of data for the working group, including: The National Renewable Energy Laboratory Alternative Fuels Data Center database, CEC Alternative and Renewable Fuel and Vehicle Technology Program grant reporting, California Air Resources Board grant reporting, and Low Carbon Fuel Standard reporting. SCE and CalETC revive these recommendations.

As noted above, SCE and CalETC particularly support the Alternative Fuels Data Center database as a key resource, and recommend that the Energy Commission incorporate data from that resource into its Demand Forecast.

A working group could take the form of one of the DAWG “pup” subgroups, similar to the Energy Efficiency pup group. SCE and CalETC are happy to coordinate with the Energy Commission others to discuss the potential for forming such a working group and helping to inform and refine the TE forecast consistent with the state’s long-term TE and environmental policy goals.

SCE and CalETC appreciate the Energy Commission’s consideration of these comments and looks forward to its continuing collaboration with the Energy Commission and stakeholders. 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*

Catherine Hackney  
on behalf of SCE and CalETC