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*Comment Received From: Southern California Edison Company  
Submitted On: 6/11/2020  
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**SCE Comments on HD ZEV Workshop for 2020 IEPR Update**

*Additional submitted attachment is included below.*



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June 11, 2020

California Energy Commission  
Docket Office, MS-4  
Re: Docket No. 20-IEPR-02  
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. 20-IEPR-02: IEPR Commissioner Workshop on Heavy-Duty Zero-Emission Vehicle Market Trends

Dear Commissioner Monahan:

On May 20-21, 2020, the California Energy Commission (CEC) hosted a workshop to gather information on the latest trends and market progress for medium- and heavy-duty zero-emission vehicles (ZEVs) in support of the *2020 Integrated Energy Policy Report Update (2020 IEPR Update)*. Across three sessions, panels consisting of fleet managers, vehicle and off-road equipment manufacturers, port facilities, transit agencies, and community stakeholders discussed the market status for medium- and heavy-duty ZEVs, including trucks, off-road equipment, and buses. Southern California Edison (SCE) appreciates the opportunity to engage with the CEC and other stakeholders on this topic, and would have welcomed the chance to play a more active role in the event as a panelist.

As outlined in SCE's *Pathway 2045*, the most cost-effective path to reaching California's economywide decarbonization and carbon neutrality goals includes electrifying two-thirds of medium-duty vehicles and one-third of heavy-duty vehicles by 2045.<sup>1</sup> This also has air quality benefits, especially for low-income communities disproportionately impacted by transportation emissions – particularly communities near heavily-trafficked truck and freight corridors.

At the workshop, panelists often cited inefficient deployment of customer-side charging infrastructure as a key barrier to accelerated medium- and heavy-duty electric vehicle adoption. This is natural for a nascent market. Regulations and purchase incentives from the California Air Resources Board such as the proposed Advanced Clean Truck rule and Hybrid and Zero-Emission Truck and Bus Voucher Incentive Project (HVIP) provide key drivers for vehicle manufacturers to increase model availability and encourage adoption. SCE supports these activities because they will help kickstart the market and improve planning efficiency when deploying customer-side charging infrastructure.

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<sup>1</sup> For more information on *Pathway 2045*, please visit <https://www.edison.com/home/our-perspective/pathway-2045.html>.

The level of medium- and heavy-duty transportation electrification necessary to meet California's environmental goals will significantly increase electricity demand in concentrated areas (e.g., near warehouses, ports, and transit hubs), which will require proactive grid upgrades that are initiated well before the demand actually materializes. However, current planning requirements present a key barrier. The California Public Utilities Commission (CPUC) requires the electric utilities to use the CEC's demand forecast for distribution system planning. Given the state of the market, the forecast does not reflect enough medium- and heavy-duty transportation electrification to meet state goals. Unfortunately, this becomes a self-fulfilling prophecy because electric utilities cannot make the necessary grid upgrades to support electrification if widespread electrification does not appear in the CEC's demand forecast, and the market is unlikely to accelerate unless customers have confidence that grid upgrades will not hinder or delay their infrastructure needs. Therefore, it is imperative that the CEC's demand forecast provide a scenario showing the impact of widespread transportation electrification to meet the state's environmental goals. This will empower electric utilities and the CPUC to make the necessary proactive grid upgrades to support medium- and heavy-duty transportation electrification.

SCE thanks the CEC for consideration of the above comments and looks forward to continuing its partnership with stakeholders in the development of the *2020 IEPR Update*. Please do not hesitate to contact me at (415) 929-5518 with any questions or concerns you may have. I am available to discuss these matters further at your convenience.

Very truly yours,

/s/

Dawn Anaiscourt