

# PLUG IN AMERICA



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September 15, 2009

The Honorable Jim Boyd  
Vice Chair, California Energy Commission  
Re: Docket No. 09-ALT-1  
1516 Ninth Street  
Sacramento, CA 95814-5512

**DOCKET**

**09-ALT-1**

DATE SEP 15 2009

RECD SEP 17 2009

Re: Feedback on CEC Staff Workshop for the 2010-11 Investment Plan - Electric Drive Vehicles

Dear Chairman Boyd:

We applaud your work and the California Energy Commission (CEC) for its commitment in developing the 2010-2011 AB118 Investment Plan. Thank you for the opportunity to participate in this process and provide you with feedback.

We support the CEC staff efforts to include a wide array of California based EV manufacturers (including both small urban commuter vehicles with 2 or 3 wheels as well as medium and heavy duty trucks) in the EV manufacturing equipment and facilities portion of the AB118 Investment Plan. We urge the CEC to fund the program appropriately to support the additional classes of vehicles.

We participated in a coalition of a dozen companies designing and manufacturing 2 and 3-wheeled plug-ins who have not had the ability to participate in Department of Energy funding opportunities, not because they lack merit, but because they simply don't have 4 wheels. Consumers want these vehicles as options, we should allow consumers choice and support these companies, especially because some are already available today.

We also fully support the proposal to use the funding allocated for EV manufacturing equipment and facilities as leverage for a guaranteed loan program, similar to the CALCAP program being used by ARB for the AB118 AQIP program. This would allow seven times the leverage in funding and provide for a direct return on your investment which could be used in future investment plans in later years.

In response to other questions raised at the workshop, Plug In America has a great deal of experience in the utilization of the existing infrastructure based on current EV consumers. Most EV drivers will charge overnight at home, with some also charging at their place of business. We estimate that as much as 80% of the time, home charging will be used. However, EV Infrastructure remains important in helping with consumer acceptance of the next generation of plug-in hybrids and EVs.

Plug In America believes that EV infrastructure and chargers should be widespread and sited at popular destinations (shopping malls, theatres, sporting venues, airports, etc). We also recommend doing less concentrated installations and having better geographic coverage. As vehicles are deployed, charging infrastructure can then be backfilled. The CEC may want to poll the plug-in vehicle manufacturers on where their prospective customers are and use that information to provide the CEC with additional authoritative information on which cities would benefit the most from charger support for EVs.

On question 2, the main item the utilities need to do is to streamline the process for providing rate plans for EVs, so someone can just sign up online with them and quickly take advantage of less expensive overnight EV rates. Also, imagine going home the first day with your new EV and you want to fast charge with 220V and you don't have an outlet in your garage. You'll have to pull a permit, get an electrician, and pay to run conduit and an outlet. Many of the next generation EVs partially solve this problem because you can charge with 110V right away, but people are going to want faster charging and this utility/permitting process is an obstacle.

Finally, with respect to carbon credits, we believe that vehicles should get to benefit from the carbon credits that they offset by driving and that those benefits should accrue to the consumer. We think that the best scenario at the moment would give the carbon credits to the EV manufacturer and then have the EV manufacturer pass them on to the consumer as an additional incentive, reducing the vehicle price. This mechanism is in the very early stages but CEC could have a significant impact.

Please feel free to contact me if you have any questions and thank you again for all the great work you to reduce our petroleum dependence and carbon footprint.

Sincerely,

A handwritten signature in black ink, appearing to read "Jay Friedland". The signature is stylized and cursive.

Jay Friedland  
Legislative Director, Plug In America

Cc: Tim Olson, California Energy Commission  
Peter Ward, California Energy Commission