



October 28, 2009

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09-IEP-1A	
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California Energy Commission
Dockets Office, MS-4
Re: Docket No. 09-IEP-1A
1516 Ninth Street
Sacramento, CA 95814-5512

Re: Comments on Draft 2009 IEPR

Docket # 09-IEP-1A

To Whom It May Concern:

The California Electric Transportation Coalition (“CaETC”) thanks you for the opportunity to comment on the *2009 Integrated Energy Policy Report* (“Draft IEPR”). CaETC is a non-profit association with a board of directors that includes: Southern California Edison, Sacramento Municipal Utility District, San Diego Gas & Electric, Pacific Gas & Electric, and the Los Angeles Department of Water and Power. California is likely to be a major focus of initial mass marketing of a new generation of EVs that have the potential to provide significant environmental and economic benefits. We strongly support the CEC’s inclusion of alternative fuels in its Transportation Fuels Supply and Demand assessment as it now more accurately reflects the changing nature of California transportation industry and therefore the different needs of a much more diverse industry. The following comments only focus on that section and its recommendations.



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On page 149 of the Infrastructure Adequacy section, the *Draft IEPR* attempts to describe the most pressing issues and barriers affecting transportation infrastructure, including electric transportation. CaETC believes this discussion in much more dense than outlined. At the very least the Draft IEPR should reference that most if not all of the most pressing issues impacting electric transportation infrastructure policy are currently being debated at the California Public Utilities Commission in its *Order Instituting Rulemaking to Consider Alternative Fuel Vehicle Tariffs, Infrastructure and Policies to Support California’s Greenhouse Gas Emissions Goals* (“OIR”). The OIR is currently seeking responses to questions related to residential, commercial and public charging and infrastructure policy, legal issues related to ownership and operation of infrastructure, codes and standards, electric system impacts, tariff related issues, incentives and education and outreach, to name just a handful. So far 19 utilities, vehicle manufactures, infrastructure service providers and manufactures, environmental organization, ratepayers groups and others stakeholders have filed responses to 42 far reaching questions which tallies up over 500 pages. CaETC recommends adding to the list of recommendation that the CEC and the ARB coordinate and actively participate in this proceeding especially as it relates to and potentially impacts the Alternative and Renewable Fuel and Vehicle Technology Program, the AB 118 Investment Plan and the Low Carbon Fuel Standard.

A non-profit association
promoting cleaner, healthier air
through the development and use of
zero-emission electric vehicles,
hybrid electric vehicles,
electric mass transit buses and rail.

Along those same lines, the *Draft IEPR* also appropriately lays out the thick body of work by the State in support of alternative fuels, including the State Alternative Fuels Plan, the AB 118 Investment Plan and the Low Carbon Fuel Standard. Key to the success of any statewide initiative such as this is communication and coordination among all the agencies and stakeholders. The *Bioenergy Action Plan for California* is a recent example of coordinating agencies with assigned tasks and goals which is revised and adjusted as the State makes its way to meeting Governor Schwarzenegger's bioenergy goals. An even better example would be the EV Task Force in the 1990s which is accredited with many of the achievements made in getting California EV-ready, including emergency response guidelines and curriculum, building codes and signage, to name a few. To adequately follow-up on all the work being done to get California EV-ready once again, CalETC strongly recommends the *Draft IEPR* recommend state agencies should be coordinating on a regulation basis with relevant stakeholders to ensure a successful introduction of FEVs and PHEVs to California.

On page 151, the *Draft IEPR* notes that alternative fuel refueling sites must meet consumer expectations for access and convenience and must be in place when the vehicle arrives. CalETC believes, in fact, that the CEC is best situated to assess and track infrastructure placement in California at least as it relates to electric transportation through its *AB 118 Investment Plan* process. Twelve million dollars has been set aside to address these barriers but the CEC should be tracking, assessing and developing priorities for future investment plans. Additionally, the side bar on AB 118 Investment Plan on page 161 highlights the GHG goals of the program, but should also highlight the role AB 118 funding will play in reducing barriers and tracking whether or not infrastructure development is meeting consumer expectation for access and convenience.

CalETC takes issue with one point made on page 160 relative to the Transportation and the Environment section. While the *Draft IEPR* accurately outlines FEV and PHEVs huge potential to reduce GHG emissions it suggests, however, more careful consideration is needed in formulating broad based policies due to some regional reliance on coal. That statement is completely ignoring 20 years of science and studies supported by the State, including the CEC, that BEVs have 72% fewer GHG emissions than their gasoline counterpart. These studies take into account the full fuel cycle of emissions including California's electric generation mix based on natural gas combined-cycle power combined with California's RPS policy. With the expected AB 32 Cap and Trade regulations and future reductions in coal imports, these numbers will only get better. This GHG emissions analysis is supported by the CEC's own *State Alternative Fuels Plan* and is why the State has a Zero-Emission Vehicle mandate and electricity scores so high in nation's first Low Carbon Fuel Standard. There is simply no question to the GHG benefits of electric transportation and such a statement suggesting otherwise should be deleted.

Thank you for the opportunity to provide these comments. Please call should you have any questions.

Sincerely,



Julee Malinowski-Ball

Interim Executive Director