

June 2, 2011

Mr. James D. Boyd, Vice-Chair and Presiding Member
Ms. Carla Peterman, Commissioner and Associate Member
California Energy Commission
Dockets Office, MS-4
Re: Docket No. 10-ALT-1
1516 Ninth Street
Sacramento, CA 95814-5512

Subject: 10-ALT-1
Reference: 2011-2012 Investment Plan for the Alternative and Renewable Fuel and Vehicle Technology Program, Committee Draft Report.

Dear Commissioners Boyd and Peterman:

The California Electric Transportation Coalition (CalETC) appreciates the opportunity to comment on the 2011-2012 Investment Plan for the Alternative and Renewable Fuel and Vehicle Technology Program, Committee Draft Report. CalETC is a non-profit association with a board of directors that includes: Los Angeles Department of Water and Power, Pacific Gas & Electric, Sacramento Municipal Utility District, San Diego Gas & Electric and Southern California Edison.

California will be a major focus of initial mass marketing of a new generation of plug-in electric vehicles (PEVs). PEVs provide significant environmental and economic benefits. For the purposes of our comments PEVs include both battery electric vehicles and plug-in hybrid electric vehicles.

The California Electric Transportation Coalition is pleased to support, for the most part, the investment plan for PEVs in the Committee Draft Report. Specifically, CalETC supports the Committee findings here and provides some comments:

- Residential charging is a high priority and CalETC is encouraged that the CEC will consider incentives for PEV customers to defray residential infrastructure costs. *CalETC would point out that there are regional efforts to provide similar incentives and we encourage the CEC to build upon and/or complement existing efforts.*
- Charging infrastructure for multi-dwelling units (MDUs) faces challenges and CalETC is pleased to see that the CEC will consider grants that help solve the complex challenges unique to MDUs. *CalETC would point out that there are regional efforts to address these challenges and we encourage the CEC to build upon and/or complement existing efforts.*
- Workplace and fleet PEV charging grants should be encouraged particularly, as specified in the Committee Draft Report, those projects with emphasis on outreach to business and fleet owners.

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- Regional PEV readiness efforts are essential to the successful introduction and large-scale deployment of PEVs. The readiness actions outlined in the California PEV Collaborative report were gathered after many conversations with those currently implementing PEV readiness efforts in their cities and regions. *We encourage the CEC to build upon and/or complement existing efforts.*

CalETC *does not* support the inclusion of Tables 7 and 8 in the Committee Draft Report. These tables are misleading and provide no defensible indication of PEV deployment. The Report indicates these “numbers represent a minimum roll out,” which is not accurate given the description of the data in the last paragraph on page 40 of the Committee Draft Report. As stated in our previous comments:

“CalETC expects that the number of PEVs coming to California will dramatically increase in the next 5 years. Our estimates for PEVs in California are based on information from the major auto makers and twelve external studies by entities including Tiax, Charles River Associates, Electric Power Research Institute and the California Air Resources Board. It should be noted that California is considered a key market for PEVs as hybrid vehicles have sold very well in California relative to other states. Although only about 10 percent of the new vehicles sold in the U.S. are sold in California, California represents approximately 18 percent of the new vehicle market for hybrid vehicles. This factor, along with the impacts of the economic slowdown, was considered in CalETC’s projections for PEV sales. In the 2015 timeframe, CalETC PEV projections range from a low of 125,000, mid-range of 250,000-275,000 and high of approximately 450,000. These estimates represent cumulative numbers of vehicles sold between 2010 and 2015 and CalETC believes the mid-range projection to be the most likely.”

Thank you for your consideration. Please contact me if you have any questions.

Sincerely,



Eileen Wenger Tutt
Executive Director

EWT/kmg