CalETC
California Electric Transportation Coalition

California Energy Commission
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CalETC 2013-14 IEPR Comments – Docket Number 13-IEP-1A

The California Electric Transportation Coalition (CalETC) appreciates the opportunity to comment on the 2013-2014 Integrated Energy Policy Report (IPER), Revised Staff Draft. 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.

CalETC fully supports the CEC staff's work in adding high speed rail, light rail and port electrification to the IEPR (page G-4 and in the California Energy Demand 2014-2024 Revised Forecast[1]) and including high medium and low cases for light duty PEVs (California Energy Demand 2014-2024 Revised Forecast[2]) as other stakeholders have been requesting this. We welcome the opportunity to provide assistance with CEC's assessments of transportation electrification segments such as off-road equipment, airport ground support equipment, ports and rail in future IEPRs.

Please note the federal tax credit for battery EVs and plug-in hybrids (EVs and PHEVs) does not expire after 200,000 of each model are sold, but moderately begins to phase down after each manufacturer reaches 200,000 EVs and/or PHEVs sold and expires one year after the 200,000 unit per manufacture threshold is met[3]. (see page 186 and page 193)

The Carbon Intensity chart for gasoline and substitutes found on page 188 in figure 27 illustrate considerable GHG reductions from plug-in electric vehicles. As a result of this finding, please consider a suggested revision to this sentence found on page 193 in the Electric Transportation section to read as follows:

- Electric vehicles offer a significant reduction in GHG emissions compared to gasoline or diesel-fueled vehicles <u>today</u> ~~particularly if~~ <u>and this only increases as</u> renewable electricity is ~~the source of vehicle charging~~ <u>further added to the electricity mix</u>.

Also, please note the roadmap being developed by the California ISO is not on vehicle-to-grid. The most recent CEC – Cal ISO workshop was on vehicle grid integration which includes both vehicle to grid technologies and other much broader technology options such as managed charging. (page 200)

Comments on the Transportation Energy Chapter Recommendations

The Renewable Fuel Standard is not fuel neutral and does not include the many low carbon fuels included in California's LCFS including *<u>electricity</u>*, natural gas, and hydrogen.

[1] Volume 1: Statewide Electricity Demand, End-User Natural Gas Demand, and Energy Efficiency, Pages 3, 12, 46-48
[2] Volume 1: Statewide Electricity Demand, End-User Natural Gas Demand, and Energy Efficiency, Pages 15-16, 20-21, 29, 44-46
[3] http://www.irs.gov/Businesses/Plug-In-Electric-Vehicle-Credit-(IRC-30-and-IRC-30D)

As the conversation begins on the RFS beyond its 2022 expiration, the Energy Commission, other state agencies and the State of California might consider advocating for a more fuel neutral RFS, similar to the LCFS, to replace the current RFS program. (page 201)

CalETC particularly notes the importance of recommendations 4 and 6 (pages 201 and 202), and recommend that both CARB and the air districts should be included in the recommendation on the top of page 202.

CalETC applauds the staff's commitment to welcome the input from all stakeholders in this report. We recognize there are still many steps to take to accomplish the emissions goals the state has set for 2020. We are committed to continued engagement with stakeholders, the Energy Commission and state agencies on supporting forward progress in electrification of the transportation sector.

Sincerely,

Eileen Wenger Tutt
Executive Director