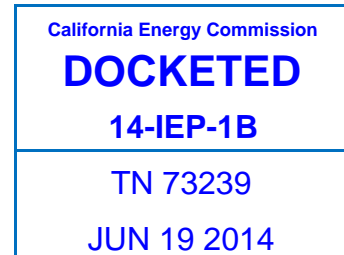




June 19, 2014

(Submitted via email: docket@energy.ca.gov)
(cc: Jim.McKinney@energy.ca.gov)

California Energy Commission
Dockets Office, MS-4
Re: Docket No. 14-IEP-1B
1516 Ninth Street
Sacramento, CA 95814-5512



Subject: Statewide Plug-In Vehicle Infrastructure

The California Electric Transportation Coalition (CalETC) appreciates the opportunity to comment on the California Energy Commission's (CEC) June 5th Workshop focused on introducing and discussing the California Statewide Plug-in Vehicle Infrastructure Assessment as part of the 2014-15 Integrated Energy Policy Report (2014 IEPR update) process. 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 is pleased to see the CEC focus this IEPR on transportation. The CEC has demonstrated strong leadership in ensuring the infrastructure and local-level needs are met. The planning and investment done by the CEC in support of plug-in electric vehicles (PEVs) is essential to the market success of this technology. We appreciate the CEC's leadership and continuing commitment to ensuring that our state will realize a future that embraces diversity in the transportation fuels sector and the economic and environmental benefits that result from this diversity.

This Workshop primarily focused on introducing and discussing the *California Statewide Plug-In Vehicle Infrastructure Assessment* prepared by the National Renewable Energy Laboratory (NREL). The Assessment was prepared under the guidance of the Energy Commission in accordance with the action item specified in the *2013 ZEV Action Plan: A Roadmap Toward 1.5 Million Zero-Emission Vehicles on California Roadways by 2025*. CalETC is supportive of the Plan and applauds the CEC's commitment to improving the infrastructure for PEVs by investing in this study that evaluated the critical infrastructure needs of California.

CalETC appreciates the work done by NREL and agree with stakeholders that the assessment will help to inform agencies and stakeholders on the importance of Electrical Vehicle Supply Equipment (EVSE) investments to meeting the state's transportation and climate change goals. The NREL assessment confirms the critical need for infrastructure investments to increase EVSE availability in regions where conditions indicate such increases would accelerate the market for PEVs. Key investments from the CEC in PEV infrastructure cannot be overstated.

It was beneficial to hear CEC agree with the general consensus raised during the panel discussion by stakeholders on the critical need for additional workplace charging and increasing EVSE in multi-

unit dwellings (MUDs). We also recommend that the CEC continue to examine ongoing efforts and the costs and benefits associated with PEV infrastructure and the “business case” for facilitating expansion of that infrastructure which the NREL assessment did not clearly enumerate costs, benefits, or the business case for various segments of the charging market or for potential stakeholders.

CalETC supports the creation of a coordinated working group facilitated by the CEC in which stakeholders share information, assumptions, and methodologies for forecasting transportation electrification and associated infrastructure which may be beneficial to ensure greater consistency, accuracy, and collaboration on the CEC’s long-term demand forecast, the next PEV infrastructure assessment, and additional planning efforts.

The need for this working group is highlighted by the differing assumptions and results from assessments provided by the California Air Resources Board, the Electric Power Research Institute, and academic institutions such as UC Davis, UCLA, etc. More opportunities for collaboration among stakeholders to share collected data, including the costs and benefits of PEV infrastructure in various charging market segments, will ensure that the investments in infrastructure made by the CEC produces the most “bang for its buck.”

In response to statements of other parties and Senior Administration officials calling for an expanded utility role, we agree that the utilities have the capabilities and track record to take on an expanded role in helping the state accelerate PEV adoption with enhanced efforts with market education, and new focus on infrastructure development through simple, low-cost, near-term activities. CalETC supports the idea of the utilities stepping up to be a more active partner with the state in meeting important state goals to address climate change and improve air quality as well as achieve environmental goals.

CalETC remains committed to continued engagement with stakeholders, the CEC and state agencies supporting the growth and success of the PEV market through infrastructure investments and the electrification of the transportation sector in California.

Sincerely,



Eileen Wenger Tutt
Executive Director

EWT/QF/kmg