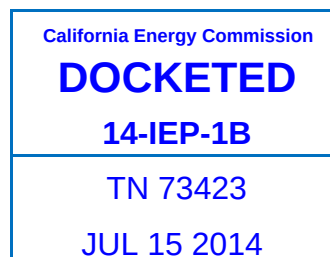




July 14, 2014

(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: The Use of Electricity and Natural Gas as Transportation Fuels.

The California Electric Transportation Coalition (CalETC) appreciates the opportunity to comment on the California Energy Commission's (CEC) June 24th Workshop focused on discussing the benefits and impacts of Electric and Natural Gas Vehicles in California 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 planning and investment done by the CEC in support of plug-in electric vehicles (PEVs) is essential to the market success of this technology. The CEC has demonstrated strong leadership in installing essential PEV infrastructure and supporting local-level action.

At this very early and critical stage of the market, demonstration and pilot programs, such as the school bus project, are important to demonstrate the potential future benefits of vehicle-to-grid technology. These benefits are unattainable beyond pilot and demonstration programs unless manufacturers and consumers are willing to participate in vehicle-to-grid efforts and PEVs make up a substantial part of the fleet. Therefore, it is essential that policy makers prioritize market acceleration at this time. Simplicity and convenience are clearly market accelerators in this early phase of the market, particularly as PEVs represent an unfamiliar new transformative technology.

Vehicle-to-grid technologies are developing rapidly and there is currently no clear indication that investments in these technologies now will be cost beneficial over the mid- to long-term. The technologically advanced smart charging systems that have communication capabilities available now are significantly more expensive than a simple charger without communications capabilities. Further, most of the advanced technologies discussed during the workshop are based on proprietary communication and control networks, which was problematic for some PEV equipment providers (Ecotality, Better Place and 350 Green were mentioned specifically).

As vehicle-to-grid, storage and other battery discharging technologies develop, direct utility involvement will be increasingly critical. Utilities must ensure that the customer interface with

California Energy Commission

Re: CalETC Comments Re Docket No. 14-IEP-1B

Electricity and Natural Gas as Transportation Fuels.

July 14, 2014

Page 2 of 2

the grid and those operating and maintaining the grid are safe. The utilities are committed to a safe, reliable, efficient, and affordable grid which benefits both consumers and grid operators. Thank you again for the opportunity to comment on this workshop and for your consideration.

Sincerely,



Eileen Wenger Tutt
Executive Director

EWT/QF/kmg