

**BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE
OF CALIFORNIA**

Order Instituting Rulemaking Regarding
Transportation Electrification Policy and
Infrastructure

Rulemaking 23-12-008
Filed December 14, 2023)

**CLEAN COALITION REPLY COMMENTS ON ORDER INSTITUTING
RULEMAKING REGARDING TRANSPORTATION ELECTRIFICATION POLICY
AND INFRASTRUCTURE AND CLOSING RULEMAKING 18-12-006**

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I. INTRODUCTION

Pursuant to Rule 6.2 of the California Public Utilities Commission (“the Commission”) Rules of Practice and Procedure, the Clean Coalition respectfully submits these reply comments on the *Order Instituting Rulemaking (“OIR”) Regarding Transportation Electrification Policy and Infrastructure and Closing Rulemaking 18-12-006*, issued at the Commission on December 14, 2023. We support the holistic discussion that the Commission raises in the OIR on the need to electrify the transportation sector. Significant changes will be required in relation to electrical distribution infrastructure, vehicle make-up (e.g., fuel switching from an internal combustion engine to an electric vehicle (“EV”)), managing the additional demand, existing consumer behaviors, and effectively integrating EVs as value creators acting as mobile batteries capable of bi-directional energy flows to and from the grid. Each of these are broad topics that will undoubtedly brush up against subjects housed in other proceedings, such as the treatment of generating resources, cost-effectiveness calculations, non-energy benefits, export compensation, interconnection procedures, and distribution grid upgrades. However, given the scope and magnitude of the subject, we agree with the Commission that it is essential to have a central location to raise and solve issues that arise during the transition. Thus, we offer the following responses to party comments on the OIR:

- We support consideration of [community] resilience and microgrids within the context of EV charging, EV uptake, and fleet charging.¹
- Pollution from internal combustion engines has local impacts. The proceeding should take into account the societal value associated with transportation electrification.² The

¹ See comments of the Green Power Institute (“GPI”) at p. 3, comments of 350 Bay Area and The Climate Center, at p. 7, and comments of PearlX, at p. 6.

² See comments of EV Energy Corp at p. 3 and comments of 350 Bay Area and The Climate Center at p. 6.

Societal Cost Test (“SCT”) should be used in cost-effectiveness calculations.

- This Commission should take note of the fact that many Californians working 9-5 jobs will likely not have access to EV chargers at work, leading to nighttime charging unless the proper incentives are provided.³ This is one way that equity should be considered in this rulemaking.⁴
- Prioritizing transparency and certainty will increase the pace of transportation electrification. Developers and municipalities need granular grid data and the certainty that the data reflects the outcome of an interconnection application. Utilities need advance notice to plan effectively, especially for EV fleet deployments.⁵
- Managed charging can improve grid reliability and limit additional demand from new EVs (and EV chargers) to the peak load, especially when paired with renewable energy such as solar power that is plentiful during the middle of the day.⁶
- We agree that EV charging patterns have the potential to limit ratepayer costs that would otherwise be associated with electrification.⁷
- EVs and EV chargers should be compensated for value provided to the ratepayers,⁸ especially during peak periods.⁹
- Ensuring efficient energization/interconnection timelines is key for swift electrification.¹⁰ Coordination between this proceeding, R. 17-07-007, R. 21-06-017, and R. 24-01-018 will be required and should not be construed as duplicative work.¹¹
- We agree that there is a disparity in EV charging access that makes it more difficult for residents of multi-unit housing facilities to adopt an EV.¹² Deploying a master metering could improve access, in addition to existing submetering allowances.

³ See comments of the Center for Accessible Technology (“CforAT”), at p. 2.

⁴ See comments of 350 Bay Area and The Climate Center, at p. 10.

⁵ See comments of the Center for Sustainable Energy (“CSE”) at p. 3, comments of The Utility Reform Network (“TURN”) at p. 6, and comments of the Natural Resources Defense Council (“NRDC”) and Environmental Defense Fund (“EDF”) at p. 6.

⁶ See the comments of Cal Advocates, at p. 5.

⁷ See the comments of Advanced Energy United (“AEU”), at p. 4.

⁸ See the comments of the Joint Parties, at p. 4.

⁹ See the comments of the GPI, at p. 3.

¹⁰ See the comments of the Coalition for California Utility Employees, at p. 3-5, comments of NRDC & EDF, at p. 3, comments of Voletera Power, at p. 3, and comments of AEU, at p. 10.

¹¹ See the comments of Pacific Gas and Electric (“PG&E”), at p. 3, comments of San Diego Gas and Electric (“SDG&E”), at p. 3, comments of Southern California Edison (“SCE”) at p. 2, and comments of The Mobility House (“TMH”), at p. 4.

¹² See the comments of PearlX, at p. 3.

- The proceeding should create standards for vehicle-to-grid integration (“VGI”) in a proactive fashion to help a young, but nascent industry flourish, rather than working reactively when significant problems arise.¹³

II. DESCRIPTION OF PARTY

The Clean Coalition is a nonprofit organization whose mission is to accelerate the transition to renewable energy and a modern grid through technical, policy, and project development expertise. The Clean Coalition drives policy innovation to remove barriers to procurement and interconnection of distributed energy resources (“DER”) — such as local renewables, demand response, and energy storage — and we establish market mechanisms that realize the full potential of integrating these solutions for optimized economic, environmental, and resilience benefits. The Clean Coalition also collaborates with utilities, municipalities, property owners, and other stakeholders to create near-term deployment opportunities that prove the unparalleled benefits of local renewables and other DER.

III. CONCLUSION

The Clean Coalition appreciates the opportunity to submit these reply comments and urges the Commission to include the issues contained above in the scope of the proceeding. We look forward to discussing the big picture and specific issues related to transportation electrification in the context of centralized proceeding.

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¹³ See the comments of the Vehicle-Grid Integration Council (“VGIC”), at p. 2 and 7.