

February 11, 2015



California Energy Commission
Docket Office, MS-4
Re: Docket No. 14-IEP-1
1516 Ninth Street
Sacramento, CA 95814-5512
docket@energy.ca.gov

Re: *Southern California Edison Company's (SCE's) Comments on the California Energy Commission Docket No. 14-IEP-1: Final 2014 IEPR Update*

Dear Commissioner Scott:

Southern California Edison (SCE) appreciates the opportunity to provide comments on the California Energy Commission's (Energy Commission's) Final 2014 Integrated Energy Policy Report Update (IEPR Update). SCE is encouraged by the IEPR Update's coverage of many important policy issues impacting California's energy future, particularly the Alternative and Renewable Fuel and Vehicle Technology Program (ARFVTP) and the transportation sector's potential to advance the state's energy, transportation, and climate goals. SCE agrees with the IEPR Update's observation that meeting these goals will require a complete transformation of the current transportation system to zero-and near-zero emission technologies and fuels. SCE strongly supports the Energy Commission's collaborative efforts to achieve these goals, alongside other state agencies and stakeholders; and SCE is eager to play a substantial role in making them a reality.

In these comments, SCE acknowledges and supports the Energy Commission's inclusion of several of SCE's comment recommendations on the Draft 2014 IEPR¹ and recommends that the Energy Commission also include reference to SCE's "Charge Ready" program in the 2014 IEPR Update.

¹ See: SCE Comments on Draft 2014 IEPR Update at:
http://www.energy.ca.gov/2014_energypolicy/documents/2014-11-24_workshop/comments/Southern_California_Edison_Company_Comments_2014-12-08_TN-74124.pdf

SCE particularly appreciates the Energy Commission's recommendations in the 2014 IEPR Update that:

1. The Energy Commission explore opportunities to collaborate with public and private entities to identify needs, and strategically leverage funding to accelerate deployment of advanced technology vehicles and associated infrastructure;²
2. The Energy Commission serve as a convening agency to bring stakeholders together to collect data and assess the current and emerging challenges and opportunities in the market to advance plug-in electric vehicle infrastructure;³
3. Utility Investment in Electric Vehicle Charging Stations (EVCS) be evaluated in light of the California Public Utilities Commission decision in Rulemaking (R.)13-11-007 that lifts the prohibition against utility ownership of electric vehicle charging infrastructure, and that Energy Commission investments be considered as a means of complementing utility investments in EVCS.⁴

SCE's only additional recommendation on the IEPR Update is for the Energy Commission to include a reference to SCE's Charge Ready program.⁵ Below is a brief description of SCE's Charge Ready program for inclusion in the IEPR Update:

SCE is proposing to help increase the availability of electric vehicle charging stations through its Charge Ready program. If approved by the California Public Utilities Commission, SCE would work with cities, employers, apartment owners, charging equipment manufacturers and others to deploy up to 30,000 qualified charging stations over 5 years at locations where cars may be parked for four or more hours. Through the Charge Ready program, SCE would build, own, and maintain the electric infrastructure (up to the stub) needed to serve qualified charging stations at participating customer locations. SCE would also offer customer rebates for qualified charging stations. Customers would be able to work directly with charging equipment manufacturers, and own, operate, and maintain the qualified charging stations of their choice. SCE's proposal also includes a broad market education program to educate customers on the grid and environmental benefits of PEVs.

For additional information on SCE's Charge Ready Program, please reference SCE's Charge Ready Application (A.) 14-04-014, filed with the CPUC on October 30, 2014.

As always, SCE appreciates the opportunity to submit these comments and looks forward to its continuing collaboration with Energy Commission in future IEPR cycles. Please do not

² See Final 2014 IEPR Update at pp. 35, 39.

³ See Final 2014 IEPR Update at p. 58.

⁴ See Final 2014 IEPR Update at p. 59.

⁵ The Energy Commission made reference to SDG&E's similar Vehicle Grid Integration Program. See Final 2014 IEPR Update at p. 133.

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hesitate to contact me at (916) 441-2369 with any questions or concerns you may have. I am available to discuss these matters further at your convenience.

Very truly yours,

/s/ Manuel Alvarez

Manuel Alvarez