TransPower

California Energy Commission
DOCKETED
12-EPIC-1
TN #67467
OCT. 02 2012

October 2, 2012

California Energy Commission - Dockets Office, MS-4
1516 Ninth Street
Sacramento, CA 95814-5512

**Subject: Docket No. 12-EPIC-01 – Comments from TransPower**

**To the Commissioners and Staff:**

On behalf of TransPower, I appreciate being able to comment on the Electric Program Investment Charge (EPIC) Draft Triennial Funding Program. This funding program correctly identifies specific challenges facing the grid over the next decade as it accommodates an increasing number of renewable generation resources and electric vehicles. TransPower is particularly supportive of Strategic Objective #9: "***Advance Plug-In Electric Vehicle Infrastructure and Use EVs to Improve the Operation and Performance of California's Power Grid"*** and its goal of transforming electric vehicles from a challenge for grid reliability into a resource that can help stabilize the grid.

A heavy duty electric vehicle contains a battery pack with a storage capacity in the hundreds of kWh. It would be of great benefit to the ratepayers, grid stakeholders, and to the operators of these heavy duty vehicles if CAISO were able to utilize these energy storage resources for frequency regulation and other grid stabilization functions.

Referring back to the Order issued May 31 by the CPUC, on page 99 are listed guiding principles, including

- Societal Benefits,
- Greenhouse gas mitigation, and
- Low-emission vehicles/transportation

Although the Draft Staff Report details several choices that have societal benefits and greenhouse gas mitigation, it is our observation that the Report has no direct commitments to supporting the Demonstration and Deployment of low emission --- particularly Zero Emission --- vehicles and transportation systems. ZEV transport offers key societal benefits and greenhouse gas mitigation, and particularly if deployed at ports and in city school yards. We urge that the Commissioners and Staff reconsider and add significant demonstration programs

13000 Danielson Street, Suite D Poway, California 92064 www.transpowerusa.com

TransPower

focused on transportation with ZE vehicles, and particularly focus on port goods movement and inner city mitigation aspects that can be addressed best by replacing other heavy duty transport. By such means the Investment Plan can more closely reflect these guiding principles of the CPUC Order.

Thus, TransPower requests that the Investment Plan should specifically call for expanded funding for development and deployment of large battery-electric vehicles, such as Class 8 trucks for goods movement and transit and school buses for passenger transport. These large electric vehicles will yield particularly high returns on investment, as measured by the Energy Commission's own criteria. Large electric vehicles are also well suited as a platform to develop and then demonstrate the transportation-related technologies outlined in the investment plan, such as vehicle-to-grid functionality.

Thank you for your consideration of our comments. We look forward to following this investment plan as it moves forward.

Sincerely,

Paul B. Scott, Sc. D.
Vice President, Advanced Technologies
TransPower