

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

Application of Southern California Edison
Company (U338E) for Approval of Its Charge
Ready and Market Education Program.

Application 14-10-014
(Filed October 30, 2014)

**RESPONSE OF THE CALIFORNIA ENERGY STORAGE ALLIANCE
TO SOUTHERN CALIFORNIA EDISON COMPANY'S (U 338-E) PETITION FOR
MODIFICATION OF D.16-01-023 REGARDING SOUTHERN CALIFORNIA EDISON
COMPANY'S APPLICATION FOR CHARGE READY AND MARKET EDUCATION
PROGRAMS**

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In accordance with Rules of Practice and Procedure of the California Public Utilities Commission (“Commission”), the California Energy Storage Alliance (“CESA”)¹ hereby submits this response to the *Southern California Edison Company’s (U 338-E) Petition for Modification of D.16-01-023 Regarding Southern California Edison Company’s Application for Charge Ready and Market Education Programs* (“PFM”), filed by Southern California Edison Company (“SCE”) on March 5, 2018.

¹ 8minutenergy Renewables, Able Grid Energy Solutions, Advanced Microgrid Solutions, AltaGas Services, Amber Kinetics, American Honda Motor Company, Inc., Axiom Exergy, Brenmiller Energy, Bright Energy Storage Technologies, BrightSource Energy, Brookfield Renewables, Centrica Business Solutions, Consolidated Edison Development, Inc., Customized Energy Solutions, Demand Energy, Doosan GridTech, Eagle Crest Energy Company, East Penn Manufacturing Company, Ecoult, EDF Renewable Energy, ElectrIQ Power, eMotorWerks, Inc., Energport, Energy Storage Systems Inc., EnerNOC, ENGIE Energy Storage, E.ON Climate & Renewables North America, Fluence Energy, GAF, Geli, Greensmith Energy, Gridscape Solutions, IE Softworks, Ingersoll Rand, Innovation Core SEI, Inc. (A Sumitomo Electric Company), Iteros, Johnson Controls, Lendlease Energy Development, LG Chem Power, Inc., Lockheed Martin Advanced Energy Storage LLC, LS Power Development, LLC, Magnum CAES, Mercedes-Benz Energy, NantEnergy, National Grid, NEC Energy Solutions, Inc., NextEra Energy Resources, NEXTracker, NGK Insulators, Ltd., NRG Energy, Inc., Ormat Technologies, Parker Hannifin Corporation, Pintail Power, Qnovo, Range Energy Storage Systems, Recurrent Energy, Renewable Energy Systems (RES), Semptra Renewables, Sharp Electronics Corporation, SNC Lavalin, Southwest Generation, Sovereign Energy, STOREME, Inc., Sunrun, Swell Energy, True North Venture Partners, Viridity Energy, Wellhead Electric, and Younicos. The views expressed in these Comments are those of CESA, and do not necessarily reflect the views of all of the individual CESA member companies. (<http://storagealliance.org>).

I. RESPONSE.

In their PFM, SCE requests \$22 million in bridge funding to install an additional 1,000 electric vehicle (“EV”) charging ports, with the bridge funding coming from the \$333 million authorized for Phase 2 funding, thereby reducing Phase 2 funding by \$22 million. SCE requests this bridge funding because the Phase 1 pilot program has been fully subscribed since January 2017, all within one year of launch of the Charge Ready and Market Education Program in January 2016. As SCE notes, the Phase 2 application will not be filed until possibly May 2018, creating a potentially 12- to 18-month gap where there is no EV charger deployment support until the Phase 2 launch, which depends on the Commission’s regulatory processes and approval of the application. The bridge funding is therefore intended to prevent start-and-stop deployment of charging ports.

As a party to the Joint Settlement, CESA is pleased to see SCE’s continued support for EV charger deployment. CESA supports the PFM because it better ensures steadier market transformation (rather than start-and-stop deployment) by closing a potential gap in funding between Phase 1 and Phase 2 of the Charge Ready and Market Education Program. SCE’s request appears to balance the objectives of maintaining market momentum under a successful Phase 1 pilot framework while still reserving the majority of Phase 2 funding to make improvements based on pilot-phase learnings for a full-scale program. Furthermore, SCE does not introduce any changes to the Phase 1 framework that would have necessitated additional regulatory and stakeholder processes. Instead, the Phase 1 framework, which was settled and approved after an extensive stakeholder process, is maintained and SCE simply seeks to continue to support EV charging deployments without overly impacting the goals of Phase 2. CESA finds the request to be non-controversial and reasonable in light of the goals of this program as well as the state’s overall transportation electrification goals.

CESA thus finds SCE's request in its PFM to be reasonable and prudent and recommends that the Commission grant its request.

II. CONCLUSION.

CESA appreciates the opportunity to submit this response to the PFM and looks forward to working with the Commission and SCE for Phase 2 of the Charge Ready and Market Education Program.

Respectfully submitted,



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