

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

Application of Southern California Edison  
Company (U338E) for Approval of its Charge  
Ready 2 Infrastructure and Market Education  
Programs.

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Application 18-06-015  
(Filed June 26, 2018)

**RESPONSE OF THE CALIFORNIA ENERGY STORAGE ALLIANCE  
TO THE APPLICATION OF SOUTHERN CALIFORNIA EDISON COMPANY (U 338-  
E) FOR APPROVAL OF ITS CHARGE READY 2 INFRASTRUCTURE 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”)<sup>1</sup> hereby submits this response to the *Application of Southern California Edison Company (U 338-E) for Approval of its Charge Ready 2 Infrastructure and Market Education Programs* (“Application”), filed by Southern California Edison Company (“SCE”) on June 26, 2018.

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<sup>1</sup> 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, Brookfield Renewables, Carbon Solutions Group, Centrica Business Solutions, Consolidated Edison Development, Inc., Customized Energy Solutions, Dimension Renewable Energy, Doosan GridTech, Eagle Crest Energy Company, East Penn Manufacturing Company, Ecoult, EDF Renewable Energy, ElectrIQ Power, eMotorWerks, Inc., Enel, Energport, ENGIE, E.ON Climate & Renewables North America, esVolta, Fluence Energy, GAF, General Electric Company, Greensmith Energy, 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., Parker Hannifin Corporation, Pintail Power, Primus Power, Range Energy Storage Systems, Recurrent Energy, Renewable Energy Systems (RES), Sempra Renewables, Sharp Electronics Corporation, SNC Lavalin, Southwest Generation, Sovereign Energy, Stem, STOREME, Inc., Sunrun, Swell Energy, True North Venture Partners, Viridity Energy, VRB 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. INTRODUCTION.**

CESA supports SCE's vision as laid out in their *Clean Power and Electrification Pathway* white paper for electric vehicle ("EV") deployment and generally supports the proposals for further "make-ready" infrastructure buildout as well as the construction rebates to support new builds of EV charging ports at multi-unit dwellings. Overall, CESA believes that SCE has smartly incorporated the lessons of Phase 1 of its Charge Ready Program and made adjustments to its programs to improve site host and customer engagement, facilitate greater EV charging infrastructure buildout, and identify ways to support grid management needs.

## **II. SCE'S PROPOSAL ALIGNS WITH THE GOVERNOR'S GOALS FOR ELECTRIC VEHICLE DEPLOYMENT AND IMPROVES UPON ITS PILOT PHASE.**

CESA agrees with SCE that ambitious goals must be set to achieve the state's greenhouse gas ("GHG") goals by 2030 and 2050, which will require electrifying the state's transportation sector to take advantage of an increasingly clean electric grid. Building out EV charging infrastructure to support greater EV deployments will be important to decarbonizing our transportation sector – a significant source of GHG emissions and other pollutants.

SCE's proposals also smartly leverage the lessons learned from the Phase 1 pilot. For example, CESA supports the improvements to drop the port minimum requirements, which takes into account the parking limitations and feedback on multi-unit dwelling customers' preferences for more decentralization of EV charging ports. The focus on multi-unit dwellings also fits with SCE's observation that multi-unit dwellings were a customer segment that lacked robust participation in Phase 1.

Furthermore, CESA supports SCE incorporating new technologies into its proposal while seeking to maintain flexibility in the program to accommodate "emerging technologies" as they

arise and become commercially viable. CESA thus supports SCE's Phase 2 proposals to incorporate direct current fast chargers ("DCFC") that support certain EV charging needs but will likely require some stakeholder review on specific eligibility requirements developed by SCE in siting these DCFCs to maximize the cost-effectiveness of these investments. Similarly, CESA agrees that emerging solutions such as integrated/mobile storage may offer significant grid and customer benefits and should be considered through future modifications of this program.

Lastly, CESA supports the exploration of how EV chargers can not only support deployment across multiple customer segments but also how these resources can serve as a grid asset, such as through responses to EV rates or through demand response ("DR") participation. These factors are considered in SCE's Application, but CESA wishes to explore this further here in this proceeding.

### **III. CONCLUSION.**

CESA appreciates the opportunity to submit this response to SCE's Application and looks forward to participating in this proceeding with the Commission, SCE, and other stakeholders.

Respectfully submitted,



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