

**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)

**COMMENTS OF THE CALIFORNIA ENERGY STORAGE ALLIANCE
TO THE PROPOSED DECISION GRANTING PETITION FOR MODIFICATION**

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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 these comments to the *Proposed Decision Granting Petition for Modification* (“PD”), issued by Administrative Law Judge (“ALJ”) Goldberg on November 13, 2018 in response to *Southern California Edison Company’s (U 338-E) Petition for Modification of Decision 16-01-023 Regarding Southern California Edison Company’s Application for Charge Ready and Market*

¹ 174 Power Global, 8minutenergy Renewables, Able Grid Energy Solutions, Advanced Microgrid Solutions, AltaGas Services, Amber Kinetics, American Honda Motor Company, Inc., Avangrid Renewables, Axiom Exergy, Boston Energy Trading & Marketing, Brenmiller Energy, Bright Energy Storage Technologies, Brookfield Renewables, Carbon Solutions Group, Centrica Business Solutions, Clean Energy Associates, 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, Form Energy, GAF, General Electric Company, Greensmith Energy, Ingersoll Rand, Innovation Core SEI, Inc. (A Sumitomo Electric Company), Iteros, Johnson Controls, KeraCel, 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, Quidnet Energy, Range Energy Storage Systems, Recurrent Energy, Renewable Energy Systems (RES), Semptra Renewables, Sharp Electronics Corporation, SNC Lavalin, Southwest Generation, Sovereign Energy, Stem, STOREME, Inc., Sunrun, Swell Energy, Tenaska, Inc., True North Venture Partners, Viridity Energy, VRB Energy, WattTime, 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>).

Education Programs (“PFM”), submitted by Southern California Edison Company (“SCE”) on March 5, 2018.

I. INTRODUCTION.

The PD grants SCE’s PFM that would authorize an additional \$22 million in bridge funding for Phase 1 of SCE’s Charge Ready Program. This funding would support a minimum of 1,000 charge ports, but the PD conditioned the bridge funding on requiring a 20% target for multi-unit dwelling (“MUD”) installations given the limited success at reaching MUDs through this program. In these brief comments, CESA expresses its support of the PD and applauds the Commission for continuing the market transformation of supporting the development of electric vehicle service equipment (“EVSE”) and other electric vehicle (“EV”) related infrastructure.

II. THE BRIDGE FUNDING ENSURES STEADY MARKET TRANSFORMATION AND SMARTLY CLOSES A GAP BETWEEN PHASE 1 AND PHASE 2.

CESA supports the PD for ensuring steady (rather than stop-start) deployment and closes a gap between Phase 1 and Phase 2, which is currently being reviewed through the application process to assess how the Charge Ready Program could be scaled from pilot status. The small sum of money to be transferred from Phase 2 to Phase 1 should not overly impact Phase 2 deployments. CESA also finds it reasonable to condition the bridge funding on requiring a 20% target for MUD installations, as proposed in the PD, which is consistent with the MUD targets of the other investor-owned utilities’ (“IOU”) EV programs. By reducing the port minimum for MUD sites, this customer segment may see better success in this program as MUD participation has been highlighted as being limited by parking space and being driven by large complexes wanting to deploy EV charging stations throughout the grounds (rather than in one central location). Considering SCE has proposed to offer construction rebates supporting up to 16,000 charge ports

at new multi-unit dwellings to encourage site owners to go beyond ‘EV-ready’ to ‘EV-operable’ in its Phase 2 application (A.18-06-015), there may be additional learning benefits of providing this focus through the MUD target attached to the Phase 1 bridge funding that could inform the Phase 2 application review process and identify solutions to overcome barriers to the MUD customer segment. In sum, CESA supports the approval of the PD because it ensures continued market transformation of EV and EVSE deployments by reducing the gap between Phase 1 and the opening of Phase 2 and by not taking too much away from post-pilot, full-scale deployment efforts, while making some interim improvements that take advantage of some of the preliminary lessons learned from Phase 1 (*i.e.*, the underserved MUD customer segment).

III. CONCLUSION.

CESA appreciates the opportunity to submit these comments to the PD 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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