

Comments of Southern California Edison (SCE) on the Workshop on Metrics and Methodologies for Evaluating Transportation Electrification Programs and the Data Collection and Reporting Templates

Introduction

In an email from Carolyn Sisto, California Public Utilities Commission (Commission), dated May 10, 2019, Energy Division (ED) invited parties to submit comments on the May 9, 2019 Workshop on Metrics and Methodologies for Evaluating Transportation Electrification Programs and the Commission-issued utility data collection and reporting templates for the Investor-Owned Utilities' (IOUs') SB 350 TE programs. Southern California Edison (SCE) appreciates the opportunity to provide comments on the workshop and the data collection and reporting templates.

Comments on the Metrics and Methodologies for Evaluating Transportation Electrification Programs Workshop

SCE appreciates ED's effort in putting together a thoughtful and organized workshop. SCE recommends additional workshops among stakeholders before the Commission establishes any additional metrics. SCE agrees with workshop participants that stakeholders should be required to provide consistent and standardized data, and shares workshop participants' concerns about data storage.

Comments on the Reporting Templates

SCE appreciates ED's effort in developing the reporting and data collection templates. The reporting template instructs the utilities to "submit one report for each individual project." SCE requests that ED clarify that the report is intended for a program or pilot in its entirety and not per project site. Producing an individual report for each project site would be onerous and require a significant amount of resources to support, especially in light duty programs where there may be thousands of project sites. One aggregate report will provide key insights and themes of the program or pilot, while individual projects will not provide that insight.

SCE offers the following comments on specific aspects of the utility reporting template.

Section 4

The Reporting Template requires that each project allocate costs into broad project categories. SCE is concerned that these broad categories will present issues when comparing costs across utilities because each utility allocates costs differently. Aligning each utility's broad categories with another's may be difficult and create inconsistencies. For example, cost per port or cost per site can include or exclude the cost of the make-ready and/or charging station rebate depending on the structure of the utility's program. In addition, the categories do not account for differences among utility customer site host types and utility operational approaches. SCE proposes ED have further discussions with the utilities on how best to standardize cost reporting (i.e., refine charging station installation costs into more specific categories) so that meaningful comparisons and insights can be drawn from data and reporting.

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Section 5.a.

The Reporting Template requires that the utility provide the equipment procurement or qualification process for each project. The utilities are working on a centralized safety and certification process through a third-party administrator for non-utility-owned charging stations. Once these activities are transferred to the third-party administrator, this reporting requirement should no longer apply to the utilities.

Section 10.a.

The Reporting Template requires the utility to provide a description of each customer's vehicles before the project is commenced. This requirement should only be applicable to self-contained fleets. This information is very difficult to track for non-fleet customers. For example, a workplace or apartment complex does not have the ability to require or easily predict how quickly their employees or residents will adopt electric vehicles. Some fleet customers, in contrast, will have a long-term plan for electric vehicle adoption which can be provided. Additionally, SCE recommends that the vehicle requirement also include vehicle growth at the site rather than just vehicle replacements. This metric will take into account proposed fleet growth plans at the site enabled by utility programs.