

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

Order Instituting Rulemaking to Continue
the Development of Rates and
Infrastructure for Vehicle Electrification.

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**COMMENTS OF THE UTILITY REFORM NETWORK ON THE SB 350
TRANSPORTATION ELECTRIFICATION DATA COLLECTION AND
UTILITY REPORT TEMPLATES**



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COMMENTS OF THE UTILITY REFORM NETWORK ON THE SB 350 TRANSPORTATION ELECTRIFICATION DATA COLLECTION AND UTILITY REPORT TEMPLATES

I. INTRODUCTION

The Utility Reform Network (“TURN”) appreciates the opportunity to provide comments on data collection and reporting templates for utility electric vehicle (EV) programs.

Fundamentally, continual learning and program adjustment will be critical to optimize EV infrastructure programs. This will only be accomplished through analysis of data coming from these relatively new programs.

II. Data Collection Template

The primary environmental and financial benefits to ratepayers of utility EV programs are incremental EV adoption and incremental EV miles traveled (eVMT) through decreases in local and global emissions and increases in load that can be attributed to the existence of the utility program. EV infrastructure programs are a relatively new activity for the utilities and have not been conducted on the scale embarked upon in recent years. Accordingly, there is a dearth of literature and information in terms of both how to measure incremental EV adoption and eVMT, and what effect utility programs have on these key measures. While Energy Division’s data collection template includes these metrics, it does not instruct the utilities how they should be measured. This stands in contrast to other important data requested in the template like utilization, costs, and ports installed, which are objective metrics that are relatively easily measured.

TURN thus recommends that Energy Division or the utilities contract with an outside research entity to use surveys and any other techniques necessary to measure incremental EV adoption and EV miles traveled at various program sites. Part of this effort would likely involve establishing a control group or area for purposes of comparison to provide initial measurement and standardized approaches to measurement of these outcomes. While the challenge is more acute for the light-duty EV sector, it would be helpful to have a more nuanced understanding of incrementality for medium-heavy duty programs as well, as it may not be appropriate in all circumstances to attribute purchased vehicles to a utility program.

III. Utility Report Template

A. Load Management and Grid Integration

Effective load management for EVs will be more and more important as EV adoption increases. Accordingly, utility transportation electrification (TE) programs should collect data regarding the effectiveness of customer outreach strategies used to incentivize managed charging. Customer surveys should be used as part of this data collection effort to inform future efforts. These surveys should include questions regarding how well customers understand the various load management options offered and the potential financial, reliability, and environmental benefits of managed charging. These surveys should be conducted both pre- and post-program participation to provide information on the effectiveness of various load management customer communication and education methods.

B. Outreach and Education

As discussed above, the primary environmental and financial benefits to ratepayers of utility EV programs relate to incremental EV adoption which is why TURN strongly supports the inclusion of “Customer-reported incremental vehicle adoption due to project” in the final report template. This section of the template should also include a subsection addressing leveraged funds and resources. In this subsection, the utilities should explain what public and private EV education and outreach campaigns and/or resources were coordinated with and leveraged. Examples of leveraged resources could be jointly sponsored ride-and-drive events or directing customers to general EV education websites such as Veloz or Electric for All. Including this subsection will help ensure the utilities are leveraging existing resources and provide parties and the Commission with information regarding how these resources are being leveraged.

Regarding the subsection, “Effectiveness of customer outreach methods”, if the utilities are permitted to conduct general EV education and awareness campaigns as part of individual TE applications (which TURN does not support), then the impacts of these campaigns should be evaluated. For example, customer surveys should be conducted to measure the effectiveness of these campaigns at increasing EV awareness, educating customers on the benefits of driving an EV, and dispelling common misconceptions about EVs.