

LCFS Electricity Workgroup Meeting

Tuesday, October 26, 2010

Agenda

- Review of regulated party language
- Comments received from July meeting
- Plans to modify regulated party language for clarity
- CPUC Alternative Fueled Vehicle Proceeding update
- LCFS Advisory Committee
- LCFS Advisory 10-03
- ZEV Electricity Metering Workgroup

LCFS Regulated Party for Electricity

- The electricity service provider unless one of the following exists:
 - Bundled service provider who provides access to vehicle charging under contract with vehicle owner/operator
 - Owner of charging equipment, provided a contract with service provider exists
 - Owner of home with charging equipment, provided contract with service provider exists

Reasons for Third Party Default

- Third party bundled service providers are eligible to receive credits by default.
- Bundled service providers install charging infrastructure and sell fuel.
- Similar to regulated party for fossil CNG – parties who establish infrastructure may receive credits.
- Charging infrastructure necessary for the success of the LCFS.

Comments Received after July Meeting

- Comments on (6)(A) credit provision for load-serving entity
- Comments on (6)(B) credit provision for third-party bundled charging service providers
- General comments

Comments on Provision for Load-Serving Entity

(A) The load-serving entity or other provider of electricity services, unless section 95484(a)(6)(B), (C), or (D) below applies. “Load-serving entity” has the same meaning specified in Public Utilities Code (PUC) section 380. “Provider of electricity services” means a local publicly-owned utility, retail seller (as defined in PUC section 399.12(g)), or any other person that supplies electricity to the vehicle charging equipment;

- Comment: SCE suggested changing “load-serving entity” to “Utility Distribution Companies”
- Response: Further discussion needed
 - Does this clarify?
 - How does this impact CPUC provisions?

Comments on Provision for Load-Serving Entity

(A) The load-serving entity or other provider of electricity services, unless section 95484(a)(6)(B), (C), or (D) below applies. “Load-serving entity” has the same meaning specified in Public Utilities Code (PUC) section 380. “Provider of electricity services” means a local publicly-owned utility, retail seller (as defined in PUC section 399.12(g)), or any other person that supplies electricity to the vehicle charging equipment;

- Comment: BP America suggested changing language to make “producers” of electricity first in line for credits provided there is a “direct contract path between producer and the transportation fuel distributor or consumer”
- Response: More information is necessary. What is the “contract path”?

Comments on Provision for Third-Party Bundled Service Providers

(B) The electricity services supplier, where "electricity services supplier" means any person or entity that provides bundled charging infrastructure and other electric transportation services and provides access to vehicle charging under contract with the vehicle owner or operator;

- Comment: SCE commented that utilities should receive credits because they have the responsibility for distribution system upgrades
- Response:
 - Acknowledge utilities' obligation
 - Need information on costs vs. revenue from off-peak charging
 - Aren't costs passed on to ratepayers?

Comments on Provision for Third-Party Bundled Service Providers

(B) The electricity services supplier, where "electricity services supplier" means any person or entity that provides bundled charging infrastructure and other electric transportation services and provides access to vehicle charging under contract with the vehicle owner or operator;

- Comment: SCE requested clarification of the language to specify utilities will receive home charging credits
- Response:
 - Had envisioned utilities receiving home charging credits
 - Question: Utilities' commitment to submetering?

Comments on Provision for Third-Party Bundled Service Providers

(B) The electricity services supplier, where "electricity services supplier" means any person or entity that provides bundled charging infrastructure and other electric transportation services and provides access to vehicle charging under contract with the vehicle owner or operator;

- Comment: SCE and CalETC requested that language specify service contract minimum length of 6 or 12 months
- Response: ARB staff is looking for input from the workgroup.

Comments on Provision for Third-Party Bundled Service Providers

(B) The electricity services supplier, where "electricity services supplier" means any person or entity that provides bundled charging infrastructure and other electric transportation services and provides access to vehicle charging under contract with the vehicle owner or operator;

- Comment: SCE commented that the term “bundled charging infrastructure and other electric transportation services” could refer to utilities also
- Response: ARB staff is soliciting suggestions for replacement language.

Comments on Provision for Third-Party Bundled Service Providers

(B) The electricity services supplier, where "electricity services supplier" means any person or entity that provides bundled charging infrastructure and other electric transportation services and provides access to vehicle charging under contract with the vehicle owner or operator;

- Comment: CalETC requested that the regulation include requirements of third parties:
 - Disclosure to utilities in advance of install
 - Provide for discrete metering by utility for load management
 - Provide program to encourage off-peak charging
 - Use standardized equipment
- Response: ARB staff does not believe the LCFS regulation is the appropriate vehicle to include these requirements.

General Comment

- Comment: CalETC suggested that ARB consider whether or not it is appropriate to provide LCFS credits when incentives such as AB 118 funds and federal stimulus funds are offered.
- Response: ARB continues to work with CEC on AB 118 funding and we are unaware of any conflicts at this time. If there are specific situations in which stakeholders believe there is a conflict, please let us know.

Plans to Modify Regulated Party Language for Clarity

- No change in policy that would modify intent of present language at this time
- Possible minor changes to language for clarity to be presented at May Board hearing

CPUC Alternative Fueled Vehicle Proceeding update

- CPUC staff update on Proceeding activities

LCFS Advisory Panel

- Regulation requires ARB to establish Advisory Panel
- Participants: CEC, CPUC, fuel providers, storage and distribution operators, OEMs, environmental justice organizations, environmental groups, academia, public health, other stakeholders
- Work with ARB staff on LCFS review/evaluation
- ARB now reviewing list of potential participants

LCFS Advisory 10-03 (September 2010)

- Submittal of 2010 Q1 and Q2 reports is recommended but optional
- Timely submittals of 2010 Q3 and Q4 reports and annual compliance report are required
- Timely, complete and accurate submittal is required for 2011 quarterly and annual reports

ZEV Electricity Metering Workgroup

- To discuss metering standardization and implementation issues
- LCFS regulation requires use of meters to receive LCFS credits in commercial applications, in residential applications if metering is installed, and in all applications after January 1, 2015
- Utilities have agreed to have residential metering capability by 2015
- LCFS regulation allows an approved estimation technique to be used prior to 2015

ZEV Electricity Metering Workgroup

- Metering workgroup will discuss estimation techniques today
- Metering workgroup meeting following a short break after this meeting: 2:30 to 4:30 p.m.
- Call-in number 1-888-989-7698
Participant passcode: 8462720

Next Steps

- Continue to monitor CPUC rulemaking
- Zero Emission Vehicle staff to begin electric metering workgroup
- Board update in November 2010
- Potential regulation modifications to be presented to Board spring 2011

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