

CALIFORNIA AIR RESOURCES BOARD ZEV AIRPORT SHUTTLE BUS

Lisa McGhee

19-6-2

**COMMENTS OF SAN DIEGO AIRPORT PARKING COMPANY (SDAP) ON
CARB PROPOSED REGULATION OF ZERO-EMISSION AIRPORT SHUTTLE
REGULATION**

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June 27, 2019

I. COMMENTS

A. Vehicles Inventory

SDAP was able to obtain much more vehicle inventory and data facts than ARB was able to obtain. SDAP gathered facts on 19,534 active vehicles at the 3 large California hub airports: LAX, SFO and SAN. The vehicle inventory includes the ground transportation (GT) operations of OAP, Hotel, Rental Car, On Airport, Crew and Employee shuttles which total 1,088 vehicles and is 6% of the GT vehicle inventory which is potentially subject to the ASB measure. The other Ground Transportation vehicles at each of these airports, that would not be part of the vehicles in the ASB measure; but are important facts to share, in order for this agency to comprehend the amount of emissions that will still impact the airports which is respectively a very large population. The others GT vehicles are Shared Ride Vans, Limousines, Charter buses, Motor Coach buses, Scheduled buses and Taxis and make up a total of 18,446 vehicles which is 94% of the GT vehicles at these airports.

Among the GT vehicles there is a total of 10.7 Million annual trips that were reported in 2018. The ASB Modes are 41% of the trips and is 4.4 million annual trips (this includes all classes of vehicles including the Class 2b/3). The other modes, not in the measure, is 59% and 6.2 million annual trips.

This determines that 40% of the vehicles that could potentially be in the measure will not be due to the fact that these are all Class 2b and Class 3 vehicles. SDAP is concerned that ARB's inventory is not reflective of the facts and determines that only 4% and 752 vehicles out of the entire 19,500 vehicles will be under the measure. This measure should achieve a fairness among all operations at the airport; otherwise this is a burden on a small number of operations.

B. LCFS

Fleets that do not own the infrastructure or that use other hubs will not be able to generate credits.

ARB has incorrectly demonstrated the cost models including Cost over the Lifetime, Cost to Business over Regulation Lifetime, Local Governments over Regulation Lifetime by using an assumption of LCFS credits. This modeling is not accurate and thereby an alternative without the LCFS should be modeled. For example, in San Diego, currently the approved PYD CPUC pilots and the PR CPUC pilots are all infrastructure that is owned by SDGE and thereby the credits are not accessible to the fleets under this model. The same will apply if the EVSE is owned by the EVSP, for example with the VW programs, infrastructure if installed under these programs will not be owned by the fleets, which in these cases changes the results in each of the analysis. There is no standard today in the commercial sector as to these installations and ownership models.

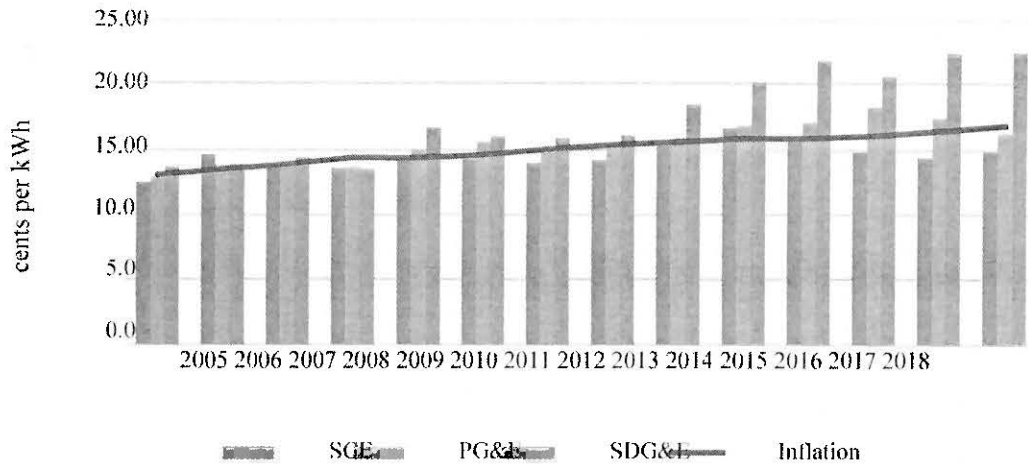
C. 17 Cents per kWh average

Airport shuttle operators in San Diego and other operators that will be in other utility tariffs cannot install sub-meters when installing infrastructure. Thereby any load associated with the current business operation after the installation of EVSE charging and its charging power is missing from the cost analysis. Additionally, small operators' tariffs are not included in your analysis. SDAP is providing its current kWh rate as supporting documents to validate that its kWh annual rate in the AP TOU rate averages 27 cents per kWh. It appears that these small business commercial rates and other business loads were not included in your analysis which creates an incorrect average as any existing load that is new is impacted by Peak demand due to charging patterns for Airports cannot be scheduled and the averaging analysis is not taking into account the fact that the rising price trend is 9% in San Diego over the other Utilities. See below Average Rates and Trends.

AB67 -2018 California Electric and Gas Utility Cost Report – CPUC April 2019 Released

Increases in System Average Rates generally tracked inflation from 2005 through 2012. SDG&E's average rates have been above the Consumer Price Index (CPI) since 2009, PG&E's and SCE's average rates are below the inflation rate (Figure 1.1). From 2014 to 2018, system average rates across the three electric IOUs have decreased at an annual average of approximately 0.1% (Table 1.8), which is below the average annual inflation rate of 1.5% over the same time period, even though SCE and SDG&E show an increase this year. In 2018, SCE's system average rate was 14.96 cents per kilowatt hour (¢/kWh), PG&E's was 16.43 ¢/kWh, and SDG&E's was 22.40 ¢/kWh. To show the effect of inflation from 2005 – 2018, the average of all three utilities' system average rate in 2005, adjusted for inflation to 2018 nominal dollars, is 16.87 ¢/kWh. The average of all three utilities' system average rate for 2018 is 17.9 ¢/kWh, which suggests that the cost of electricity to the ratepayer generally increased 1.03 ¢/kWh since 2005 when excluding the effects of inflation. The average rate of the utilities in 2005 adjusted for inflation to arrive at a 2018 CPI- adjusted average rate is 16.87 ¢/kWh.

Figure 1.1: Trends in Electric System Average Rates (2005-2018)



Annual Inflation Rate (2008-2018) ⁷											
2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	Average (2014-18)
3.8%	(0.4%)	1.6%	3.2%	2.1%	1.5%	1.6%	0.1%	1.3%	2.1%	2.4%	1.5%

Table 1.8: Annual Change in Electric System Average Rates (2014-2018)

Utility	2014		2015		2016		2017		2018		Average
	Rate	% Change	Rate	% Change	Rate	% Change	Rate	% Change	Rate	% Change	% Change
SCE	16.70	(4.8%)	15.90	(4.8%)	14.90	(6.3%)	14.48	(2.8%)	14.96	3.3%	(2.7%)
PG&E	16.90	1.2%	17.10	1.2%	18.28	6.9%	17.42	(4.7%)	16.43	(5.7%)	(0.6%)
SDG&E	20.12	8.2%	21.77	8.2%	20.54	(5.6%)	22.32	8.7%	22.40	0.3%	2.9%

For SDG&E, system average rates have generally trended above inflation in recent years. SDG&E has seen increased costs of procuring power as well as a shortened cost-recovery period due to a delay in its 2012 GRC. All three utilities have experienced declines in kWh sales, which also lead to increased system average rates when revenue requirement remains flat or rises. Small incremental declines in average rates for PG&E in 2018 result from recent outcomes in its GRC and lower fuel costs.

D. Class 2b and Class 3 Vehicles 8,500 to 14,000 GVWR Vehicle Inventory and impact on Measure if not supported.

SDAP specifically request that Class 2b and Class 3 vehicles to be supported by the measure whereby all classes of vehicles in these modes of transportation would be ZEV certified which should determine that all vehicles will be reliable and safe. When the Class 2b and 3 is included this will determine reduced emissions from another 40% more vehicles in these categories of On and Off Airport vehicles resulting in an increase of over 1.8 million ZEV trips annually among the large California hub airports. See below tables that were derived from Public Request Response by LAWA / LAX, SFO and SAN Airport. These responses are from June 2019 and the below tables were developed in order to create a snap shot of the raw data from the responses. The responses included data of over 19,500 active vehicles with details from the vehicles which included annual trips by mode of transportation, seat capacity, make and model, mode of transportation permit, and name of business entity for all current vehicles permitted and operating in Ground Transportation at each California large hub airport. This included all On Airport and Off Airport Private operations, as ARB had little and no responses from the private sector in their survey and thereby the impact of the private sector which is very dominate failed to be accurately reflected. The below tables provide these facts to achieve the impact by the private sector and determines that 40% of the On and Off Airport vehicles that are among these modes of transportation are Class 2b and 3.

TABLE 1:

VEHICLE INVENTORY / AIRPORT GT PASSENGER VEHICLES

(no TNC's included)

Table In ARB ASB Measure, are Class 4+
Color Codes: Not in ARB ASB Measure

Resource: Public Request Response from each airport, June 2019: LAWA/LAX, SFO, SAN. ~Lisa McGhee, San Diego Airport Parking Company

LAX Airport	OAP	%	Hotel	%	Rental Car	%	On Airport	%	Crew	%	Employee	%	Shared Ride Vans	%	Scheduled Bus	%	Limo Sedans	%	Charter and Coaches	%	Taxi	%	Total	%	ASB Measure Class 4+	ASB Measure Class 2b/3
<u>LAX</u>	104	1%	177	2%	224	2%	66	0.61%	93	1%			213	2%	64	0.59%	5,840	54%	1,736	16%	2,320	21%	10,837	100%		
Class 2b/3	11	11%	74	42%	3	1%	0	0%	41	44%			213	100%	25	39%	1,157	20%	11	1%	0	0%	1,535	14.16%		129
Class 4+	93	89%	103	58%	221	99%	66	100%	43	46%			0	0%	38	59%	0	0%	1,725	99%	0	0%	2,289	21.12%	526	
LDA (not TNC's)	0	0%	0	0%	0	0%	0	0%	9	10%			0	0%	1	2%	4,683	80%	0	0%	2,320	100%	7,013	64.71%		
Total	104	100%	177	100%	224	100%	66	100%	93	100%			213	100%	64	100%	5,840	100%	1,736	100%	2,320	100%	10,837	100.00%	5%	1%

SFO Airport	OAP	%	Hotel	%	Rental Car	%	On Airport	%	Crew	%	Employee	%	Shared Ride Vans	%	Scheduled Bus	%	Limo Sedans	%	Charter and Coaches	%	Taxi	%	Total	%	ASB Measure Class 4+	ASB Measure Class 2b/3
<u>SFO</u>	59	1%	64	1%	23	0%		0.00%	61	1%	34	0%	101	1%		0.00%	2,926	41%	2,434	34%	1,457	20%	7,159	100%		
Class 2b/3	45	76%	7	11%	19	83%			29	48%	0	0%	47	47%			82	3%	380	16%	0	0%	609	8.51%		100
Class 4+	14	24%	54	84%	0	0%			25	41%	31	91%	5	5%			1	0%	1,957	80%	0	0%	2,087	29.15%	124	
LDA (not TNC's)	0	0%	3	5%	4	17%			7	11%	3	9%	49	49%			2,843	97%	97	4%	1,457	100%	4,463	62.34%		
Total	59	100%	64	100%	23	100%			61	100%	34	100%	101	100%			2,926	100%	2,434	100%	1,457	100%	7,159	100.00%	2%	1%

SAN Airport	OAP	%	Hotel	%	Rental Car	%	On Airport	%	Crew	%	Employee	%	Shared Ride Vans	%	Scheduled Bus	%	Limo Sedans	%	Charter and Coaches	%	Taxi	%	Total	%	ASB Measure Class 4+	ASB Measure Class 2b/3
<u>SAN</u>	44	3%	58	4%	50	3%	31	2%					59	4%		0%	700	46%	230	15%	366	24%	1,538	100%		
Class 2b/3	36	82%	30	52%	7	14%	0	0%					59	100%			50	7%	49	21%	0	0%	231	15.02%		73
Class 4+	8	18%	20	34%	43	86%	31	100%					0	0%			0	0%	181	79%	0	0%	283	18.40%	102	
LDA (not TNC's)	0	0%	8	14%	0	0%	0	0%					0	0%			650	93%	0	0%	366	100%	1,024	66.58%		
Total	44	100%	58	100%	50	100%	31	100%					59	100%			700	100%	230	100%	366	100%	1,538	100.00%	7%	5%

All Large Hub Calif Airports	OAP %	Hotel %	Rental Car %	On Airport %	Crew %	Employee %	Shared Ride Vans %	Scheduled Bus %	Limo Sedans %	Charter and Coaches %	Taxi %	Total %	ASB Measure Class 4+	ASB Measure Class 2b/3
LAX, SAN, SFO	207 1%	299 2%	297 2%	97 0%	154 1%	34 0.2%	373 2%	64 0.33%	9,466 48%	4,400 23%	4,143 21%	19,534 100%		
Class 2b/3	92 44%	111 37%	29 10%	0 0%	70 45%	0 0%	319 86%	25 39%	1,289 14%	440 10%	0 0%	2,375 12.16%		302
Class 4+	115 56%	177 59%	264 89%	97 100%	68 44%	31 91%	5 1%	38 59%	1 0%	3,863 88%	0 0%	4,659 23.85%	752	
LDA (not TNC's)	0 0%	11 4%	4 1%	0 0%	16 10%	3 9%	49 13%	1 2%	8,176 86%	97 2%	4,143 100%	12,500 63.99%		
Total	207 100%	299 100%	297 100%	97 100%	154 100%	34 100%	373 100%	64 100%	9,466 100%	4,400 100%	4,143 100%	19,534 100.00%	4%	2%
Vehicles in ASB Measure						1,088 6%				18,446 94%		19,534 100.00%	6%	94%

Fact: Increase 300 vehicles (2%) and you increase another 1.8 million ZEV Trips (40% more of trips that could fall under the measure from Class 2b/3)

Table 2

TABLE 2:

2018 ANNUAL TRIPS, AIRPORT GROUND TRANSPORTATION

(no TNC's included or Passenger Cars)

Table In ARB ASB Measure, are Class 4+
Color Codes: Not in ARB ASB Measure

Resource: Public Request Response from each airport, June 2019: LAWA/LAX, SFO, SAN. ~Lisa McGhee, San Diego Airport Parking Company

Airport GT Trips	OAP %	Hotel %	Rental Car %	On Airport %	Employee %	Shared Ride Vans %	Scheduled Bus %	Charter Bus and Limos %	Taxi %	Total %
LAX Trips	455,537 7%	745,854 12%	1,100,896 18%	373,960 6%		169,133 3%	40,476 1%	1,652,726 27%	1,664,894 27%	6,203,476 100%
SFO Trips	240,284 8%	306,180 10%	80,219 3%		454,345 15%			880,411 28%	1,131,626 37%	3,093,065 100%
SAN Trips	198,184 14%	108,818 8%	250,000 18%	125,000 9%		55,545 4%		100,000 7%	583,404 41%	1,420,951 100%
LAX, SAN, SFO Trips	894,005 8%	1,160,852 11%	1,431,115 13%	498,960 5%	454,345 4%	224,678 2%	40,476 0.4%	2,633,137 25%	3,379,924 32%	10,717,492 100%
Trips by ASB Measure					4,439,277 41%				6,278,215 59%	10,717,492 100%

Fact: Increase another 1.8 million ZEV Trips (40% more of trips that could fall under the measure from Class 2b/3 vehicles)

SFO 2018: Fiscal Year 2018

http://media.flysfo.com.s3.amazonaws.com/assets/investor/FY18_Audited_Financial_Statements.pdf

Fiscal year 2018 passenger traffic at SFO concluded with 57.8 million passengers, an increase of 7.0% compared to the prior fiscal year, establishing a new peak for the Airport. Total cargo and U.S. mail tonnage increased by 4.8% due to increases in both domestic and international shipments. Overall enplaned passengers totaled 28.8 million, a 7.2% increase, with 22.0 million domestic and 6.9 million international enplaned passengers, increases of 7.0% and 7.9%, respectively. Cargo and U.S. mail tonnage increased by 4.8%, reflecting a freight increase of 4.6%, and mail increase of 5.8%.

Public parking and transportation revenues, consisting of rentals and fees derived from parking facilities and ground transportation operations, increased by 0.8%, from \$150.5 million in fiscal year 2017 to \$151.7 million in fiscal year 2018. Parking revenue decreased by \$5.9 million (5.5%) due to the net effect of a 5.9% decline in the average ticket price from \$32.66 in fiscal year 2017 to \$30.74 in fiscal year 2018 and a 0.8% increase in parking transactions in fiscal year 2018. Ground transportation revenues, including taxi trip fee revenue, increased by \$7.1 million (16.4%) in fiscal year 2018 primarily due to both commercial vehicle trip fee rate increases of up to 20% and a 30.1% increase in transportation network company (TNC) operations at the Airport (including Uber Technologies Inc., Lyft, Inc., and Tickengo, Inc., d/b/a/ Wingz). TNC Airport pick ups/drop offs totaled nearly 9.1 million during the fiscal year resulting in \$34.5 million in trip fee revenue. Aside from scheduled buses (4.7%), all other modes of transportation experienced activity declines compared to the prior year including door to door pre arranged vans (down 23.5%), shared ride vans (down 19.4%), limousines (down 14.9%), taxis (down 13.9%), charter buses (down 7.6%), hotel shuttles (down 4.5%) and off airport parking vans (down 0.9%).

Respectfully submitted,

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Dated: June 27, 2019

Appendix:

LAX Trips 2018

Los Angeles World Airports (LAWA) Los Angeles International Airport (LAX) Ground Transportation Monthly Report All Commercial Vehicle Activity

Operator Type	December 2018			Current Month				Year Prior				Year-to-Date Comparison				
	Upper & Lower Level Volumes			Dec 2018		Market Share	Dec 2017		Market Share	% Change	Jan to Dec 2018		Jan to Dec 2017			
	Monthly	Daily Avg	Market Share	Monthly	Daily Avg		Market Share	YTD Totals			YTD Daily Avg	Last YTD Totals	Last YTD Daily Avg	YTD % Change		
CHARTER																
TRANSPORTATION CHARTER PARTY (TCP)	116,727	3,765	3.9%	136,609	4,407	4.7%	-14.6%	1,652,726	4,528	1,848,439	5,064	10.6%				
TRANSPORTATION NETWORK COMPANY (TNC)	797,759	25,734	26.8%	688,725	22,217	23.7%	15.8%	8,927,235	24,458	8,120,213	22,247	9.5%				
Total Charter	914,486	29,500	30.8%	825,334	26,624	28.3%	13.8%	10,579,961	28,986	9,968,652	27,311	6.1%				
COURTESY																
HOTEL/MOTEL	59,238	1,911	2.0%	57,437	1,853	2.0%	3.1%	745,854	2,043	691,026	1,893	7.5%				
PRIVATE PARKING	41,602	1,342	1.4%	33,770	1,089	1.2%	23.2%	455,537	1,248	424,268	1,162	7.4%				
RENTCAR-ON AIRPORT	85,025	2,743	2.9%	88,833	2,866	3.1%	-4.3%	1,100,896	3,016	1,263,644	3,462	12.5%				
Total Courtesy	185,865	5,996	6.3%	180,040	5,808	6.2%	3.2%	2,302,287	6,308	2,378,938	6,518	-3.2%				
PASSENGER STAGE CORPORATION (PSC)																
SCHEDULED SERVICE	2,993	97	0.1%	3,652	118	0.1%	-18.0%	40,476	111	43,828	120	-7.6%				
SHARED-RIDE	11,313	365	0.4%	19,479	628	0.7%	-41.9%	169,133	463	262,570	719	35.6%				
Total PSC	14,306	461	0.5%	23,131	746	0.8%	-38.2%	209,609	574	306,398	839	-31.6%				
TAXI																
TAXI	109,505	3,532	3.7%	125,344	4,043	4.3%	-12.6%	1,664,894	4,561	1,871,399	5,127	11.0%				
Total Taxi	109,505	3,532	3.7%	125,344	4,043	4.3%	12.6%	1,664,894	4,561	1,871,399	5,127	-11.0%				
LAWA																
FLYAWAY	3,735	120	0.1%	4,263	139	0.1%	12.4%	32,309	88	75,069	206	-57.1%				
LAX SHUTTLE	25,519	823	0.9%	32,495	1,048	1.1%	21.5%	341,751	936	307,679	843	11.1%				
Total LAWA	29,254	944	1.0%	36,758	1,186	1.1%	20.4%	373,960	1,025	382,748	1,049	2.3%				
COMMERCIAL TOTAL	1,253,416	40,433	42.2%	1,190,607	38,407	40.9%	5.3%	15,130,711	41,454	14,908,135	40,844	1.5%				
PRIVATE VEHICLES	1,718,637	55,440	57.8%	1,720,973	55,515	59.1%	-0.1%	19,910,762	54,550	19,610,168	53,726	1.5%				
Total Vehicle Volumes	2,972,053	95,873	100.0%	2,911,580	93,922	100.0%	2.1%	35,041,473	96,004	34,518,303	94,571	1.5%				

SAN Trips 2018

SDIA TRIPS COUNTS 2018

MODE	Jan	Feb	Mar	Apr	May	June	July	Aug	Sep	Oct	Nov	Dec	TOTAL
Courtesy	9,087	8,543	9,275	9,306	9,497	8,950	8,692	8,741	8,683	9,574	8,684	8,586	107,618
Off-Airport Parking	15,116	14,528	16,037	16,154	17,005	16,398	16,970	16,951	16,165	16,577	15,768	15,448	193,117
Taxi	44,634	52,309	50,585	51,422	51,871	46,802	43,835	42,451	45,319	52,694	50,084	31,201	563,207
Vehicle-For-Hire	4,650	4,013	4,593	4,558	4,546	4,581	4,586	4,121	3,933	4,142	3,724	3,177	50,624
TOTALS	73,487	79,393	80,490	81,440	82,919	76,731	74,083	72,264	74,100	82,987	78,260	58,412	914,566
TNC (PUs & DOs)	147,103	139,422	156,453	160,380	172,730	165,666	355,313	376,606					1,673,673
TNC Pick Ups Only									172,162	181,701	175,377	150,696	679,936
TNC Drop Offs Only									190,408	213,074	199,846	190,676	794,004
TOTALS	147,103	139,422	156,453	160,380	172,730	165,666	355,313	376,606	362,570	394,775	375,223	341,372	3,147,613

TABLE 1:
VEHICLE INVENTORY AIRPORT GT PASSENGER VEHICLES
(no TNC's included)

Resource : Public Request Response from each airport, June 2019: LAWA/LAX, SFO, SAN. ~Lisa McGhee, San Diego Airport Parking Company

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Color Codes: Not in ARB ASB Measure

LAX Airport	OAP	%	Hotel	%	Rental Car	%	On Airport	%	Crew	%	Employee	%	Shared Ride Vans	%	Scheduled Bus	%	Limo Sedans	%	Charter and Coaches	%	Taxi	%	Total	%	ASB Measure Class 4+	ASB Measure Class 2b/3
LAX	104	1%	177	2%	224	2%	66	0.61%	93	1%			213	2%	64	0.59%	5,840	54%	1,736	16%	2,320	21%	10,837	100%		
Class 2b/3	11	11%	74	42%	3	1%	0	0%	41	44%			213	100%	25	39%	1,157	20%	11	1%	0	0%	1,535	14.16%		129
Class 4+	93	89%	103	58%	221	99%	66	100%	43	46%			0	0%	38	59%	0	0%	1,725	99%	0	0%	2,289	21.12%	526	
LDA (not TNC's)	0	0%	0	0%	0	0%	0	0%	9	10%			0	0%	1	2%	4,683	80%	0	0%	2,320	100%	7,013	64.71%		
Total	104	100%	177	100%	224	100%	66	100%	93	100%			213	100%	64	100%	5,840	100%	1,736	100%	2,320	100%	10,837	100.00%	5%	1%

SFO Airport	OAP	%	Hotel	%	Rental Car	%	On Airport	%	Crew	%	Employee	%	Shared Ride Vans	%	Scheduled Bus	%	Limo Sedans	%	Charter and Coaches	%	Taxi	%	Total	%	ASB Measure Class 4+	ASB Measure Class 2b/3
SFO	59	1%	64	1%	23	0%	0.00%		61	1%	34	0%	101	1%	0.00%		2,926	41%	2,434	34%	1,457	20%	7,159	100%		
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Class 4+	14	24%	54	84%	0	0%			25	41%	31	91%	5	5%			1	0%	1,957	80%	0	0%	2,087	29.15%	124	
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Total	59	100%	64	100%	23	100%			61	100%	34	100%	101	100%			2,926	100%	2,434	100%	1,457	100%	7,159	100.00%	2%	1%

SAN Airport	OAP	%	Hotel	%	Rental Car	%	On Airport	%	Crew	%	Employee	%	Shared Ride Vans	%	Scheduled Bus	%	Limo Sedans	%	Charter and Coaches	%	Taxi	%	Total	%	ASB Measure Class 4+	ASB Measure Class 2b/3
SAN	44	3%	58	4%	50	3%	31	2%					59	4%	0%		700	46%	230	15%	366	24%	1,538	100%		
Class 2b/3	36	82%	30	52%	7	14%	0	0%					59	100%			50	7%	49	21%	0	0%	231	15.02%		73
Class 4+	8	18%	20	34%	43	86%	31	100%					0	0%			0	0%	181	79%	0	0%	283	18.40%	102	
LDA (not TNC's)	0	0%	8	14%	0	0%	0	0%					0	0%			650	93%	0	0%	366	100%	1,024	66.58%		
Total	44	100%	58	100%	50	100%	31	100%					59	100%			700	100%	230	100%	366	100%	1,538	100.00%	7%	5%

All Large Hub Calif Airports	OAP	%	Hotel	%	Rental Car	%	On Airport	%	Crew	%	Employee	%	Shared Ride Vans	%	Scheduled Bus	%	Limo Sedans	%	Charter and Coaches	%	Taxi	%	Total	%	ASB Measure Class 4+	ASB Measure Class 2b/3
LAX, SAN, SFO	207	1%	299	2%	297	2%	97	0%	154	1%	34	0.2%	373	2%	64	0.33%	9,466	48%	4,400	23%	4,143	21%	19,534	100%		
Class 2b/3	92	44%	111	37%	29	10%	0	0%	70	45%	0	0%	319	86%	25	39%	1,289	14%	440	10%	0	0%	2,375	12.16%		302
Class 4+	115	56%	177	59%	264	89%	97	100%	68	44%	31	91%	5	1%	38	59%	1	0%	3,863	88%	0	0%	4,659	23.85%	752	
LDA (not TNC's)	0	0%	11	4%	4	1%	0	0%	16	10%	3	9%	49	13%	1	2%	8,176	86%	97	2%	4,143	100%	12,500	63.99%		
Total	207	100%	299	100%	297	100%	97	100%	154	100%	34	100%	373	100%	64	100%	9,466	100%	4,400	100%	4,143	100%	19,534	100.00%	4%	2%

Vehicles in ASB Measure																										
											1,088	6%							18,446	94%			19,534	100.00%	6%	94%

Fact: Increase 300 vehicles (2%) and you increase another 1.8 million ZEV Trips (40% more of trips that could fall under the measure from Class 2b/3)

TABLE 2:

2018 ANNUAL TRIPS, AIRPORT GROUND TRANSPORTATION

(no TNC's included or Passenger Cars)

Table In ARB ASB Measure, are Class 4+
Color Codes: Not in ARB ASB Measure

Resource: Public Request Response from each airport, June 2019: LAWA/LAX, SFO, SAN. ~Lisa McGhee, San Diego Airport Parking Company

Airport GT Trips	OAP	%	Hotel	%	Rental Car	%	On Airport	%	Employee	%	Shared Ride Vans	%	Scheduled Bus	%	Charter Bus and Limos	%	Taxi	%	Total	%
LAX Trips	455,537	7%	745,854	12%	1,100,896	18%	373,960	6%		0%	169,133	3%	40,476	1%	1,652,726	27%	1,664,894	27%	6,203,476	100%
SFO Trips	240,284	8%	306,180	10%	80,219	3%		0%	454,345	15%		0%		0%	880,411	28%	1,131,626	37%	3,093,065	100%
SAN Trips	198,184	14%	108,818	8%	250,000	18%	125,000	9%		0%	55,545	4%			100,000	7%	583,404	41%	1,420,951	100%
LAX, SAN, SFO Trips	894,005	8%	1,160,852	11%	1,431,115	13%	498,960	5%	454,345	4%	224,678	2%	40,476	0.4%	2,633,137	25%	3,379,924	32%	10,717,492	100%
Trips by ASB Measure									4,439,277	41%							6,278,215	59%	10,717,492	100%

Fact: Increase another 1.8 million ZEV Trips (40% more of trips that could fall under the measure from Class 2b/3 vehicles)

SDAP SDGE Statement



ACCOUNT NUMBER 9404 582 206 0
 SERVICE FOR
 DAVID J MCGHEE
 S D AIRPORT PARKING CO
 2771 KURTZ ST
 SAN DIEGO, CA 92110

DATE MAILED Jun 19, 2019
 sdge.com

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Savings Alert: California is fighting climate change and so can you! Your bill includes a Climate Credit from a state program to cut carbon pollution while also reducing your energy costs. Find out how at EnergyUpgradeCA.org/credit.

Account Summary

Previous Balance			\$233.98
Payment Received	06/04/19	THANK YOU	- 233.98
Current Charges			+ 432.54
Total Amount Due			\$432.54

.7% Delayed Payment Charge Due If Paid After Jul 14, 2019.

Summary of Current Charges

(See page 2 for details)

	Billing Period	Usage	Amount(\$)
Electric	May 16, 2019 - Jun 17, 2019	1,660 kWh	432.54
Total Charges this Month			\$432.54

Seasonal Rate Change This Billing Period:
 Seasonal rates changed from Winter to Summer.

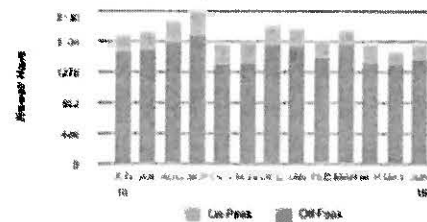
Regulatory Notices

All customers are required to pay a Competition Transition Charge as part of the charges above, including those who choose an electric service provider other than SDG&E.

DATE DUE Jul 4, 2019

AMOUNT DUE \$432.54

Electric Usage History (Total kWh used)



1,660 kWh used



- 51.8 Daily avg kWh
- 54.9 Daily avg kWh last month
- 8.3% Change in daily avg kWh from last year
- 0.5% Change in daily avg kWh from last month
- 13.5 Max monthly demand
- 19.8 Max annual demand
- 32 Days in billing cycle

Detail of Current Charges

Electric Service

Rate: Time of Use Plus - TOU-A-P-Commercial Climate Zone: Coastal

Billing Period: 5/16/19 - 6/17/19 Total Days: 32

Meter Number: 06169184 (Next scheduled read date Jul 18, 2019) Cycle: 12

Meter Constant: 1.000 Billing Voltage Level: Secondary

Circuit: 0491 *Your circuit is currently not subject to rotating outage.
However, this is subject to change without notice.*

Total Usage: 1,660 (Usage based on interval data)

ELECTRIC CHARGES

Customer Charge Amount(\$)
16.00

Electricity Delivery (Details below) 798 kWh

WINTER USAGE	On-Peak	Off-Peak	
kWh used	100	698	
Rate/kWh	\$.13812	\$.13812	
15 Day Charge	\$13.81	* \$96.41	= 110.22

Electricity Delivery (Details below) 862 kWh

SUMMER USAGE	On-Peak	Off-Peak	
kWh used	112	750	
Rate/kWh	\$.14163	\$.14163	
17 Day Charge	\$15.86	* \$106.22	= 122.08

Rate Change This Billing Period:

There was a rate change on day 18 of your Billing Period. Therefore, your charges for the first 17 days were at Rate 1, and the remaining 15 days were at Rate 2.

DWR Bond Charge 1,660 kWh x \$.00503 8.35

(Continued on next page)

Detail of Current Charges - Continued

Electricity Generation (Details below) 798 kWh

<i>WINTER USAGE</i>	<u>On-Peak</u>	<u>Off-Peak</u>	
kWh used	100	698	
Rate/kWh	\$.06739	\$.05656	
15 Day Charge	\$6.74	+ \$39.48	= 46.22

Electricity Generation (Details below) 862 kWh

<i>SUMMER USAGE</i>	<u>On-Peak</u>	<u>Off-Peak</u>	
kWh used	112	750	
Rate/kWh	\$.20995	\$.11158	
17 Day Charge	\$23.51	+ \$83.69	= 107.20

DWR Revenue Adjustment -05
California Climate Credit -2.58

Total Electric Charges \$407.44

TAXES & FEES ON ELECTRIC CHARGES

Amount (\$)

City of San Diego Franchise Fee Differential	399.14 x 5.78%	23.07
Franchise Fees on Electric Energy Supplied by Others	8.30 x 6.88%	57
State Surcharge Tax	1,660 kWh x \$.000300	50
State Regulatory Fee	1,660 kWh x \$.000580	96

Total Taxes & Fees on Electric Charges \$26.10

Total Electric Service \$432.54

Total Current Charges \$432.54

