



May 05, 2015

Clerk of the Board  
California Air Resources Board  
1001 I Street  
Sacramento, CA 95814

**SUPPORT** for Minor Modifications to the Zero Emission Vehicle Regulation

Dear Chairman Nichols and Air Resources Board Members:

The California Electric Transportation Coalition (CalEETC) appreciates the opportunity to comment on the minor modifications to the Zero-Emission Vehicle (ZEV) Regulation. CalEETC is a non-profit association with a board of directors that includes: Los Angeles Department of Water and Power, Pacific Gas & Electric, Sacramento Municipal Utility District, San Diego Gas & Electric and Southern California Edison. Our members include auto makers and other entities in the transportation industry.

California has established aggressive goals for market adoption of zero-emission vehicles, and the minor modifications proposed maintain the goals of the ZEV mandate. CalEETC appreciates CARB's and the state's commitment to the numerous policies that help accelerate transportation electrification. Auto makers are investing billions in this transition and public- and investor-owned utilities already invest or are preparing to invest significantly in transportation electrification. Policy makers, investors and industry continue to demonstrate a shared commitment to a diverse transportation fuels future.

CalEETC supports the definitional and pooling modifications, as we indicated in October 2014, please see our attached comment letter from October 2014. We support the additional lead time for intermediate-volume manufacturers and the credit deficit provision which recognized the challenges intermediate-volume manufacturers face with a three-year deficit provision.

CalEETC is committed to continued engagement with stakeholders, the California Air Resources Board and state agencies supporting the growth and success of the ZEV market and the electrification of the transportation sector in California. We appreciate the opportunity to comment in SUPPORT of the Minor Modifications to the Zero Emission Vehicle Regulation.

Sincerely,

A handwritten signature in blue ink, appearing to read "Eileen Wenger Tutt".

Eileen Wenger Tutt  
Executive Director

EWT/kmg  
Attachment



October 16, 2014

Chairman Nichols and Board Members  
California Air Resources Board  
1001 I Street  
Sacramento, CA 95812

Dear Chairman Nichols and Honorable Board Members:

The California Electric Transportation Coalition (CalETC) appreciates the opportunity to comment on the 2014 amendments to the Zero-Emission Vehicle Program. CalETC is a non-profit association with a board of directors that includes: Los Angeles Department of Water and Power, Pacific Gas & Electric, Sacramento Municipal Utility District, San Diego Gas & Electric and Southern California Edison.

CalETC fully supports the ARB staff's hard work with other states and regions as well as the regulated community and stakeholders. We generally support the pooling provisions and the definitional modifications. We have some concerns about other suggested modifications but understand there are ongoing conversations with both the regulated community and stakeholders regarding these amendments and will not provide comment until we benefit from further written and verbal discussion at the October 23<sup>rd</sup> CARB Board meeting.

We would like to provide new data points for your information as you consider the ZEV Program amendments Board and tour the ZEV showcase. The progress to date of ZEVs in the market has been impressive. The suite of policies supported by the CARB Board, in your capacities at both the state and local levels, and the Brown Administration have proven to be successful as we all work together to transform the transportation sector.

CalETC recently released a Transportation Electrification Assessment done by ICF International and E3.<sup>1</sup> This first-of-its-kind comprehensive study developed electricity demand curves for numerous transportation segments and evaluated the environmental, petroleum independence and grid benefits of transportation electrification. In all scenarios evaluated electric vehicles provide significant benefits to all Californians, whether or not they drive an electric vehicle. This was the case from an air quality, greenhouse gas emission and electricity ratepayer perspective. Although the CARB Board has long recognized the benefits of transportation electrification from an environmental perspective, the benefits to electricity ratepayers have only been qualitatively discussed. CalETC believes it will be important to incorporate the broader breadth of benefits of electrification in the context of policy making in the state. The utility industry is committed to supporting transportation electrification in the state and region.

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<sup>1</sup> California Transportation Electrification Assessment, ICF International, Updated September 2014, [http://www.caetc.com/wp-content/uploads/2014/09/CalETC\\_TEA\\_Phase\\_1-FINAL\\_Updated\\_092014.pdf](http://www.caetc.com/wp-content/uploads/2014/09/CalETC_TEA_Phase_1-FINAL_Updated_092014.pdf) and California Transportation Electrification Assessment, ICF International and E3, October 2014, <http://www.caetc.com/wp-content/uploads/2014/10/CalETC-TEA-Phase2-Final-Draft-2014-10-16.pdf>

Another benefit of plug-in electric vehicles (PEVs) is jobs creation in California. CalETC released a study by U.C. Berkeley in 2012.<sup>2</sup> The study indicated that PEVs could create 50,000 to 100,000 jobs in California in the 2030 timeframe, depending on the numbers of PEVs deployed. California is currently closer to the more aggressive deployment so Californians will likely benefit from the higher number of jobs created. The additional jobs were created for two main reasons. First, the number of jobs per dollar spent on oil is lower than the jobs per dollar spent on electricity and vehicles. That is, if consumers spend more on electricity and cars and less on oil, jobs in the state increase. Second, the multiplier benefits of fuel cost savings, electricity is about \$1 per gallon equivalent relative to the cost of gasoline or diesel. The savings on fuel tend to be spent on primarily on health care and entertainment, two local industries that create jobs across all income levels. There were other factors contributing to jobs creation in our state but the overarching finding is that there is positive jobs creation and these jobs are created across all household income levels progressively, whether or not there is a PEV driver in the household.

CalETC remains committed to continued engagement with stakeholders, the California Air Resources Board and state agencies supporting the growth and success of the ZEV market and the electrification of the transportation sector in California.

Sincerely,



Eileen Wenger Tutt  
Executive Director

cc: KMG

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<sup>2</sup> Plug-in Electric Vehicle Deployment in California: An Economic Assessment, September 2012, [http://are.berkeley.edu/~dwrh/CERES\\_Web/Docs/ETC\\_PEV\\_RH\\_Final120920.pdf](http://are.berkeley.edu/~dwrh/CERES_Web/Docs/ETC_PEV_RH_Final120920.pdf)