



October 26, 2018

Mr. Mark Williams, Mailstop E
California Air Resources Board
P.O. Box 2815
Sacramento, CA 95812

Re: Electrify America's Cycle 2 ZEV Investment Plan

Dear Mr. Williams:

Southern California Edison (SCE) appreciates the opportunity to provide these written comments of support for Electrify America's Cycle 2 California Zero-Emission Vehicle (ZEV) Investment Plan (Cycle 2 Investment Plan).

SCE supports California's leadership in adopting progressive policies to improve air quality, fight climate change, and transition to a cleaner transportation future. With programs like Electrify America's Cycle 1 Investment Plan, and utility Transportation Electrification (TE) programs—including SCE's own Charge Ready Programs—California is now leading the country in ZEV adoption and making strides towards reaching our long-term Greenhouse Gas (GHG) emissions reduction goals. SCE believes that Electrify America's Cycle 2 Investment Plan will be another important step towards accelerating the adoption of ZEVs and realizing the State's long-term transportation and climate change goals.

Despite the tremendous progress that the state has made towards advancing a clean transportation future, California still has a great deal left to do in order to reach the goals set forth in the Governor's new Executive Order B-48-18, which looks to increase the number of ZEVs on the road to 5 million by 2030, and specifies levels of ZEV infrastructure needed by 2025 to support the transition to these vehicles. Additional Senate Bills (e.g., SB 1275 and SB 1204) set forth further requirements for ZEVs, and include specifications for disadvantaged and low-income communities, as well as requirements for zero-emission medium- and heavy-duty transportation technologies. Moreover, barriers continue to impede EV adoption, such as range anxiety and lack of awareness. Given the tremendous effort required to accomplish our state policy goals, stakeholders must work together towards a rapid and sustained approach to transforming the transportation market.

As such, SCE commends Electrify America for its continued efforts to advance TE and applauds its inclusion of features in its plan such as the need for greater education and outreach on TE, increasing



investment in DC-Fast Charging (DCFC) infrastructure, and a focus on bringing TE programs to customers in Disadvantaged Communities (DACs). SCE agrees that these three categories are very important in terms of addressing barriers to ZEV adoption. In fact, SCE's Charge Ready 2 program for light-duty EV infrastructure and education, filed earlier this year, also identified these items as needed areas of focus for California. SCE therefore sees Electrify America's Investment Plan as a critical complement to utility efforts to accelerate and support the ZEV market. Time is of the essence to meet our state's environmental policy goals, and it is important that all stakeholders work together to continue the progress that has been made to date.

Utilities, like SCE, continue to be a key driving force in the acceleration of transportation electrification. With learnings from SCE's pilots and programs, including the Charge Ready pilot, utilities help to support and shape further growth for TE in an informed and strategic manner. SCE's Charge Ready 2 Program is an example of SCE's interest in extending TE further. This four-year, \$760 million program would support innovation and accelerate light-duty Electric Vehicle (EV) adoption, in line with California's goals of substantially reducing GHG emissions and criteria pollutants by 2030. Charge Ready 2, if approved, would provide the EV fueling infrastructure to support 48,000 new charging ports, additional marketing, education, and outreach (ME&O), and would meet one-third of away-from-home and multi-unit-dwelling (MUD) charging needs in SCE territory for the applicable segments by 2023. Additionally, SCE's recently-approved Charge Ready Transport program for Medium- and Heavy-Duty Fleets will fund installations of infrastructure for at least 870 customer sites by 2024. These sites are expected to support 8,490 medium- and heavy-duty fleet vehicles, including trucks, transit buses, port equipment and other industrial vehicles.

Agencies, like the California Air Resources Board (CARB), are another essential force in achieving the state's goals. For example, with the recent approval of California's point-of-purchase rebate program, funded by the Low Carbon Fuel Standard, CARB brings California another step closer towards achieving our goals by making TE more affordable for customers.

Both Electrify America's Cycle 2 Investment Plan, as well as SCE's Charge Ready programs and pilots, are essential for realizing our state goals and demonstrating California's leadership towards a cleaner, more sustainable future. However, even with both programs, a continued and enhanced focus on TE will be needed to realize the market transformation necessary to address California's comprehensive climate and air quality plans. As noted in SCE's Charge Ready 2 application, SCE's efforts only address one-third of the projected, incremental market need during the program duration¹—inviting space for Electrify America and all stakeholders to contribute to fill the gaps needed to improve our state's air quality and address GHG more broadly.

SCE looks forward to working with Electrify America, CARB, and stakeholders to continue advocating for and advancing programs to support ZEV adoption and a cleaner environment for all of our customers.

¹ See Prepared Testimony in Support of SCE's Application for Approval of its Charge Ready 2 Infrastructure and Market Education Program at p. 10.



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SCE therefore supports Electrify America's Cycle 2 Investment Plan and recommends its approval. Thank you for considering SCE's comments. If you have any questions, please contact Laura Renger at (626)302-6984, or laura.renger@sce.com.

Sincerely,

A handwritten signature in black ink, appearing to read 'Laura Renger', with a long horizontal flourish extending to the right.

Laura Renger

Principal Manager, Air & Climate Policy
Southern California Edison