



Tim Carmichael
State Agency Relations Manager

925 L Street, Suite 650
Sacramento, CA 95814
Tel: 916-492-4248
TCarmichael@semprautilities.com

October 26, 2018

Mr. Mark Williams, Mailstop 3E
California Air Resources Board
P.O. Box 2815
Sacramento, California 95812

Re: Electrify America's Cycle 2 ZEV Investment Plan

Dear Mr. Williams:

San Diego Gas & Electric ("SDG&E") is a regulated public utility that provides energy service to 3.6 million people through 1.4 million electric meters and 873,000 natural gas meters in San Diego and southern Orange counties. SDG&E service territory spans 4,100 square miles.

In SDG&E's service territory (which has less manufacturing, mining and agriculture electricity demand compared to the rest of the state), transportation accounts for approximately 50% of all GHG emissions. Light-duty vehicles in particular comprise ~ 97% of all registered vehicles in San Diego County and are responsible for approximately 80% of combined on-road and off-road GHG emissions.

SDG&E is pleased to support Electrify America's California Zero Emission Vehicle Investment Plan ("Plan") for its second cycle of ZEV infrastructure, education and awareness, and access investments in the State of California while offering the following recommendations for the subsequent investment cycles:

- **SDG&E Proposes Increased Investments in San Diego – Carlsbad Metro Area**

SDG&E advocates for increased investment in its service territory for the subsequent investment cycles to advance transportation electrification by removing barriers to adoption. Additionally, SDG&E notes that it is in the process of further engaging stakeholders to solicit feedback in creating rate options that promote transportation electrification. This current effort should address the concern noted in the Plan¹ regarding SDG&E's current rates.

- **Green City Initiative**

SDG&E advocates for expansion of the Green City Initiative in subsequent cycles in order for SDG&E to propose San Diego as a candidate for the initiative. With more than 1.37 million

¹ California ZEV Investment Plan: Cycle 2 at p. 43, Table 6, Footnote 2.

people, San Diego is the eighth-largest city in the United States and the second-largest in California², making it a prime Green City candidate to promote transportation electrification and reduce GHG emissions.

Sincerely,

/s/ Tim Carmichael

Tim Carmichael
State Agency Relations Manager

² <https://www.sandiego.gov/economic-development/sandiego/facts>