

July 24, 2017

Via Email and U.S. Mail

Chair Mary Nichols and Members
California Air Resources Board
1001 "I" Street
Sacramento, CA 95812

Richard Corey, Executive Officer
Members of the Board of CARB
c/o Clerk of the Board
Email: cotb@arb.ca.gov
Email: rcorey@arb.ca.gov

Re: Volkswagen's First 30-Month Zero Emission Vehicle Investment Plan

Dear Chair Nichols, Members of the California Air Resources Board and Mr. Corey:

I make this submission on behalf of Southern California Edison Company (SCE) regarding Volkswagen/Electrify America's ("VW's") Supplement to the first 30-Month Zero Emission Vehicle Investment Plan ("Plan"). I understand the comment period closed but hope you will consider these late-submitted comments in advance of the expected vote scheduled for July 27, 2017.

SCE fully supports California's zero-emissions policies and is taking an active role to facilitate adoption of electric vehicles (EVs). In addition to innovative programs for passenger vehicle adoption like the Charge Ready Pilot, SCE has filed an application requesting that the California Public Utilities Commission ("Commission"), approve over \$570 million in programs and investments to help grow the entire transportation electrification market over a five-year period. The application includes a particular focus on improving air quality in the region's disadvantaged communities (as identified by CalEnviroScreen 3.0) that are disproportionately affected by pollution and economic hardship. I read the July 14, 2017 joint letter submitted to your honorable Board by the California State Labor Management Cooperation Committee, Coalition of California Utility Employees, the California State Association of Electrical Workers, the National Electrical Contractors Association and the International Brotherhood of Electrical Workers regarding the Plan.

SCE agrees that if done right, VW's \$800 million investment would catapult California towards achieving its ambitious zero emissions vehicle ("ZEV") and greenhouse gas ("GHG") reduction goals. SCE recommends adoption of VW's Plan with two important modifications: (1) to require that personnel who install and maintain the ZEV site infrastructure have Electric Vehicle Infrastructure Training Program ("EVITP") certification, and (2) to require a commitment that no less than 35% of VW's investment support transportation electrification within Disadvantaged Communities.

It is critical to have properly trained and certified personnel undertake this important work laying the infrastructure groundwork for to support EV charging stations. SCE is interested in the safe operation of public EV charging stations and has confidence that requiring personnel to be properly trained before undertaking this work is in the public's interest.

In 2016, the Commission adopted a settlement between SCE and 19 parties, which, among other things, approved SCE's Charge Ready program to deploy up to approximately 1,500 EV charging stations and expand market education and outreach in support of electric transportation electrification. The Commission added what it deemed, in its words, to be "quality control" requirements above and beyond what the settlement contained. Specifically, it directed that SCE require that all contractors constructing, installing or maintaining the customer-side facilities under the Charge Ready Program be certified by the Department of Energy's EVITP.¹ The same requirement is applied to the approved EV-charging programs being administered by San Diego Gas and Electric Company (SDG&E) and Pacific Gas and Electric Company (PG&E). SCE recommends that CARB include the requirement for EVITP certification into the Plan.

Furthermore, VW's investment should provide significant benefit to disadvantaged communities, including community charging at multi-unit dwellings, workplaces, retail centers and car-share programs. SCE is encouraged by VW's Supplement to the Electrify America California ZEV Investment Plan (Cycle 1), which anticipates that 35% of investments will be in disadvantaged communities, and SCE requests a firm commitment that no less than 35% of VW's investment will support transportation electrification within these areas.

Sincerely,



Ronald O. Nichols

cc: Mark Williams (mwilliams@arb.ca.gov)

¹ D.16-01-023.