

April 21, 2015

CPUC Energy Division
Attention: Tariff Unit
505 Van Ness Avenue, 4th Floor
San Francisco, CA 94102-3298



Re: Protest of PG&E's Electric Vehicle Infrastructure and Education Program Application

Dear CPUC Energy Division Tariff Unit,

The Marin Conservation League (MCL) is writing in objection to an application by PG&E and similar applications from other Investor Owned Utilities (IOUs) to install, own and operate electric vehicle charging stations in California. MCL for over eighty years has been an advocate for the preservation and protection of the natural assets of Marin and beyond. We believe that climate change puts those assets at risk, that reducing levels of GHGs is necessary and that widespread use of EVs using cleanly sourced power is vital for achieving California's climate goals.

We believe that rather than accepting proposals to establish EV charging stations as written by Investor Owned Utilities, the CPUC should first establish its own procedures which better meet public policy objectives. Those objectives should be examined and laid out in advance, so that differing proposals from the IOU's can be fairly and efficiently evaluated. Specifically, we believe that EV charging stations should not be solely owned and operated by the IOUs. The establishment and ongoing operation of such stations should be maximally transparent and should provide for open competition and a level playing field amongst all reasonably qualified sources of supply, operation and maintenance. Moreover, interested vehicle manufacturers and user groups, non-IOU energy suppliers such as Community Choice Aggregators, and rate payer groups should be included in the formulation of CPUC policy and review of any proposed EV program and related marketing, education and outreach.

Many unanswered questions and details concerning the establishment of a major EV charging station program should be dealt with by the CPUC before granting permission to proceed. We believe that getting an EV charging station network off to a good start is an important step toward much wider usage of electric vehicles. We all have a stake in it. Clearly defined public policy objectives should drive the application and procedure. The precedent setting importance of decisions made by the CPUC at this critical point should not be overlooked.

Thank you for your attention.

Sincerely,

A handwritten signature in blue ink that reads "Jon Elam".

Jon Elam
President

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