
From: David Newell <dgeonewell@gmail.com>
Sent: Monday, May 13, 2019 10:49 PM
To: RBurns-Web
Subject: Docket # RU-00000A-18-0284
Attachments: Call Script for ACC.DOCX; EV Letter to ACC.DOCX; AZ EV factsheet_AARP.pdf; Letter of WSPA and Arizona Petroleum & Marketers Association.pdf

Follow Up Flag: Flag for follow up
Flag Status: Flagged

Dear Commissioners:

You may be receiving numerous emails or calls in the next few weeks advocating against the proposed EV rules that are apparently before the Commission at this time. As a retiree of an oil company, which I proudly served for over thirty years, I have received the email below urging me to insert your names into the attached letters or call scripts so that you will act in the interests of my former employer - at least as those interests are perceived by the Western States Petroleum Association. You may read the arguments that they make below in their own words.

I emphatically do not share their point of view. Many of the points raised in these attachments are irrelevant, inaccurate or misleading. They are raised in service of preserving the status quo of entrenched interests. These businesses perceive electric vehicles as a serious threat to their business model and are attempting to recruit those who might be seen by you as disinterested parties to promote their interests.

Instead, I am writing to request that you act in the interests of Arizonans who endure all too frequent days of unhealthy air quality - primarily due to the internal combustion engines that pollute our urban atmosphere.

The actions that you take to encourage a sustainable transportation future will have a significant impact on the quality of life for my children, grandchildren and their descendants. Please do your duty and heed the advice of health professionals and those who represent the overall interests of Arizonans, and do not give undue weight to business interests who directly profit from continued inaction.

Thank you,

David Newell
SCOTTSDALE

Begin forwarded message:

From: "Sel Larsen/Chevron Retirees Assn." <selCRA@cableone.net>
Date: May 9, 2019 at 14:27:56 PDT
To: "Sel Larsen/Chevron Retirees Assn." <selCRA@cableone.net>
Subject: Call to Action Against Arizona Corporation Commission's Electric Vehicle Policy and Implementation Plan

Hello, Chevron and Legacy Company Retirees!

WE NEED YOUR HELP! Our AZ Corporation Commission is considering some moves that may not be in the best interest of the majority especially seniors!! Take a look at the attachments – especially the AARP fact sheet - and the following notes from the Chevron Public Affairs office. Note that the deadline to be involved is May 21st.

None of us are anti-environmental or anti-conservation, but it is up to us to monitor that all rulings are fair and based on facts.

*Thanks,
Sel Larsen*

Chevron Retirees Association
Valley of the Sun/Phoenix Chapter
1411 N. Rustlers Roost
Dewey, AZ 86327
Cell: 602-524-6695

From: Cathedral-King, Marian <MCathedralKing@chevron.com>
Sent: Thursday, May 9, 2019 2:16 PM
To: Sel Larsen/Chevron Retirees Assn. <selCRA@cableone.net>
Subject: Call to Action Against Arizona Corporation Commission's Electric Vehicle Policy and Implementation Plan

Hi Sel,

The Arizona Corporation Commission (ACC) is gearing up to modify its Energy Rules giving undue advantage in favor of electric vehicles (EVs). The Western States Petroleum Association (WSPA) is asking for support to lobby against this initiative by either sending an email or making calls. I've been working with our WSPA partners on this and I've attached three things:

1. A copy of an email that can be sent to the Commissioner of the retiree
2. A telephone script that can be used if someone wants to directly call his/her legislator
3. Position paper WSPA sent to the ACC as additional information material
4. Fact Sheet prepared for AARP that captures the essence of why this move is being opposed

We hope our Chevron retiree members can make the pitch to their respective Commissioners (listed below) on or before May 21. If there is anyone who is interested to attend the hearing, please let me know so WSPA can make arrangements.

Thanks Sel and I'm happy to arrange a call with you and other retirees early next week to better explain this if you wish. Maybe we can get Jerry Barlow or Tom Kovar to send to their legislators if the others are not inclined.?

Marian

Arizona Corporation Commission

Chairman Bob Burns (R)

602-542-3682

RBurns-web@azcc.gov

Commissioner Andy Tobin (R)

602-542-3625

Tobin-web@azcc.gov

Commissioner Boyd Dunn (R)

602-542-3935

Dunn-web@azcc.gov

Commissioner Sandra Kennedy (D)

602-542-3933

SDKennedy-Web@azcc.gov

Commissioner Justin Olson (R)

602-542-0745

Olson-web@azcc.gov

Highway Robbery! An expensive and infeasible electric vehicle mandate removes consumer's choice

The Arizona Corporation Commission (ACC) is proposing to fix air pollution issues with a "solution" that won't do much to provide real air quality benefits. And the few benefits it might provide are extraordinarily expensive. For many — especially senior and low-income Arizonans — this policy would impose severe and disproportionate burdens on those who can least afford it.

An Expensive Alternative

The transition to EVs will require major investments in incentives and infrastructure. Electric cars are expensive, and building infrastructure to support those cars comes at a high cost — one that residents may not be willing to pay.

The Arizona Corporation Commission is proposing to accelerate an electric vehicle policy that hurts Arizonans.

Where the Rubber Meets the Road

Whether it is for trips to work, school or doctor's appointments, running a small business or family vacations, Arizonans choose the vehicle that fits their needs -- and they are not choosing electric vehicles.

Despite purchase incentives, new laws and regulations, and the promise to build public charging stations, most Americans are not persuaded to adopt zero emission vehicles, which are electric or hydrogen-powered vehicles. **In 2018, electric vehicles accounted for only 2.5% of vehicles sales in Arizona.**¹

Over 6 Million Passenger Cars and Trucks on AZ Roads



In 2017, of the nearly 6 million new vehicle registrations in Arizona, electric vehicles made up only 0.13%. Arizonans love their cars, SUVs, pickup and vans.

¹ <https://evadoption.com/ev-market-share/ev-market-share-state/>

Arizona families can't afford an electric vehicle.

- Millions who need reliable vehicles for work and daily living simply cannot afford the cost, maintenance and operational limitations of electric vehicles.
- Many families share one car and those living in multi-unit dwellings lack access to garages where charging stations could be located.

EV mandates- An Ineffective Emission Reduction Strategy

Borrowing a broken plan from California

- The concept of substituting EVs for conventional vehicles as a means of first reducing emissions is not new—it was first attempted in California. California's original target goals were never met, mainly because development was far slower than envisioned and the cost of zero emission vehicles remained prohibitively high.²
- There are much better ways for the State to achieve its air quality goals than by pursuing a policy that does little for the serious air quality issues it faces. Attempting to eliminate tailpipe emissions through EVs costs about \$350,000 to \$500,000 per ton of carbon reduced compared to \$8,000 per ton for a CARB LEV III regulation without ZEVs.
-

Not a replacement for existing cars

- There are over 6 million cars on the roads in Arizona. A car is a personal choice—whether it's driven by economics or pride of ownership.³
- EVs are substitutes for new cars, not replacements for old vehicles. Existing vehicles are and will continue to be subject to increasingly stringent emission and GHG standards under federal regulations.

² "Zero Emission Vehicle Benefits in Arizona," by Jim Lyons and Jon Snoeberger (December 14, 2018)

³ U.S. Auto Alliance, March 2019, <https://autoalliance.org/in-your-state/AZ/>

Docket Control

Arizona Corporation Commission

1200 West Washington

Phoenix, Arizona 85007

Dear Commissioner X,

I am writing to express my concern over the Arizona Corporation Commission's proposed electric vehicle policy and implementation plan. It is my understanding that this new policy will allow and in some instances may even require Arizona utilities to invest in infrastructure to facilitate the adoption of electric vehicles, effectively subsidizing the electric vehicle industry on the backs of utility ratepayers. As a utility rate payer in Arizona, I oppose any new taxes to finance the build out of infrastructure that will support a lifestyle choice, affordable mainly to only the most affluent. By not only allowing but encouraging this increase, you will burden many residents in Arizona, in particular a large population of retirees like me, that rely on a fixed income to make ends meet. This rate increase will also impact many working families and other restricted income residents. We should not have to pay the substantial costs of developing electric vehicle charging infrastructure. Utility rates are already too high as it is.

I urge you to reconsider the electric vehicle policy. Let the electric vehicle industry finance the construction of the infrastructure from which it will benefit, rather than burdening the majority of Arizona ratepayers with the costs of supporting the electric vehicle market and benefiting the small minority of utility customers who may drive electric vehicles.

Thank you for your time and consideration.

Sincerely,

Call Script for Arizona Corporation Commissioner Outreach:

Hello My Name is (Insert Name)

- I am calling regarding the Arizona Corporation Commission's Electric Vehicle Policy and Implementation Plan
- I have serious concerns with this plan, which would have the effect of subsidizing the electric vehicle industry on the backs of utility rate payers.
- As a resident and rate payer, I urge Commissioner (insert last name of commissioner) to reconsider this policy, as it is an ineffective and costly way to implement environmental or economic policy goals that are better addressed at the Legislature.
- It is my understanding that less than 3% of Arizonan's drive electric vehicles. Increasing our utility bills to subsidize electric vehicle drivers is an unreasonable burden on Arizona rate payers.
- The commission should not require or even allow electric utilities to finance the development of EV infrastructure on the backs of ratepayers; it is an unfair proposal and should not be supported by Commissioner (insert last name of commissioner)
- I encourage the commissioner to consider my concerns, thank you for your time.

April 17, 2019

RECEIVED
COMMISSION

Docket Control
Arizona Corporation Commission
1200 West Washington
Phoenix, Arizona 85007

2019 APR 17 P 2:02

Re: Docket No. RU-00000A-18-0284 –Western States Petroleum Association and Arizona Petroleum Marketers Association Comments on the Arizona Corporation Commission's Electric Vehicle Policy Statement and Implementation Plan

The Western States Petroleum Association ("WSPA") and the Arizona Petroleum Marketers Association ("APMA") appreciate the opportunity to provide comments on the Arizona Corporation Commission's ("Commission") Staff Implementation Plan for the Electric Vehicles, Electric Vehicle Infrastructure, and the Electrification of the Transportation Sector in Arizona Policy Statement ("Policy Statement and Implementation Plan").

WSPA has participated in every workshop and open meeting at which the electric vehicle ("EV") Policy Statement and Implementation Plan has been discussed. At not one of those meetings was any evidence presented demonstrating that the electrification of the transportation sector in Arizona will result in any of the environmental benefits that the Policy Statement blindly assumes. The only actual evidence in the record to date demonstrates that mandating a transition to electric vehicles is not a cost-effective means of achieving the environmental goals often cited by Commission Staff and members of the Commission as justification for the Policy Statement and Implementation Plan. *See* Memorandum regarding Zero Emission Vehicle Benefits in Arizona by Jim Lyons and Jon Snoeberger, attached to comments filed by WSPA in this docket on December 17, 2018.

On a more fundamental level, setting environmental policies is a matter for the State Legislature, not the Commission. The Commission's function is to set just and reasonable rates for the public service corporations ("PSC") under its jurisdiction. Not every electric utility in Arizona is regulated by the Commission – indeed, one of Arizona's largest utilities, Salt River Project Agricultural Improvement and Power District, would not be required to follow the dictates of the Policy Statement and Implementation Plan. This means that the burden of shouldering the cost of the Policy Statement and Implementation Plan would fall on only those Arizonans served by a PSC, resulting in a windfall to those that are not. The issue of transportation electrification is better left to the Legislature, which can fairly fund any requisite EV subsidies by a tax levied on all who will receive the purported benefits, not just a subset of certain utility customers.

Moreover, there has been no evidence or analysis indicating what the Policy Statement and Implementation Plan will cost PSCs and their customers. The Implementation Plan encourages PSCs to propose pilot programs, deploy EV charging stations in areas of inadequate coverage, and include EV infrastructure plans, needs, and costs in their Integrated Resource Plans, but entirely neglects to identify any associated cost recovery mechanism or provide specifics on the type of analysis that will be conducted to determine if these investments are cost effective. This deficiency is underscored by the Draft Report from the GRID Modernization Laboratory Consortium entitled "Benefit-Cost Analysis for Utility-Facing Grid Modernization Investments," filed by Chairman Burns in this Docket on April 1, 2019 ("Draft Report"). As the Draft Report makes plain, understanding the costs and benefits of grid-modernization projects, such as EV programs, is a nebulous task, and it is imperative that the Commission establish a framework for conducting a benefit-cost analysis for EV-related proposals before it moves forward to approve them.

In this case, customer equity will be a key consideration in any benefit-cost analysis, since the immediate, direct benefits of the programs contemplated by the Policy Statement and Implementation Plan will be experienced by the limited number of utility customers (and non-utility customers) that own EVs. As the Draft Report notes, "grid modernization costs are typically incurred by all utility customers, while several of the benefits accrue to a subset of customers or to society. This makes it challenging to determine how much should all utility customers be expected to pay for benefits that accrue to a subset of customers or to society in general." See Draft Report at page 9. The Commission needs to be certain that the benefits experienced by all ratepayers are sufficient to outweigh the potentially extensive program costs. Because there has yet been no benefit-cost analysis, the Commission cannot make that determination and should not move forward with the Implementation Plan. Otherwise, the Commission risks a challenge to the associated rate increase as being unjust and unreasonable.

Additionally, as noted in the joint comments filed by WSPA and Arizonans for Electric Choice and Competition in this docket on March 20, 2019, the role of the utility is supporting the proliferation of EV infrastructure should be at the same level of support the utility provides all other companies that use electricity. Cost recovery for "make ready" work should be addressed in the same manner for an EV charging station operator as it is for a new commercial development or data center. If an EV charging station operator can provide specific evidence that its facility provides grid-related or other benefits for all utility customers, it can negotiate a special contract with the utility that can be brought before the Commission for approval. No rule or policy should presume such benefits and apply a "one size fits all" approach that benefits a single industry on the backs of ratepayers.

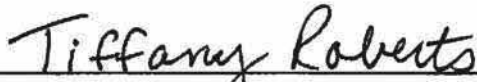
April 17, 2019

Finally, it seems apparent from the comments made by several market participants in the EV industry at the various workshops in this matter that government intervention is unnecessary to promote EVs, EV infrastructure, or the electrification of the transportation sector. The EV industry is already burgeoning in the competitive marketplace. Without incentives or ACC intervention, the penetration of EVs in Arizona has grown from 0.9% of all vehicle sales in 2017 to 2.5% in 2018. *See Memorandum regarding Zero Emission Vehicle Benefits in Arizona by Jim Lyons and Jon Snoeberger.* EV charging stations are available throughout the State to support that growth, and several EV charging station companies have described their planned investment in additional charging stations in Arizona's metropolitan areas and along Arizona's four key highways within the year. There is simply no evidence that the EV market players cannot or will not provide what is needed to sustain the growth of its own industry. The Commission should not require utility customers to subsidize an industry that is succeeding on its own.

Thank you for your consideration. We look forward to continued participation in this docket.

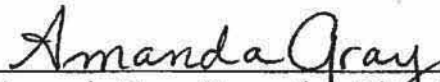
Sincerely,

Western States Petroleum Association



By: Tiffany Roberts, Director, Policy and
Regulatory Affairs

Arizona Petroleum Marketers Association



By: Amanda Gray, Executive Director

Docket Control
Page 4
April 17, 2019

Original and 13 copies filed this
17th day of April, 2019, with:

Docket Control
Arizona Corporation Commission
1200 West Washington Street
Phoenix, AZ 85007

Copy of the foregoing emailed this
17th day of April, 2019 to:

Legal Division
Utilities Division
Arizona Corporation Commission
1200 West Washington Street
Phoenix, Arizona 85007
LegalDiv@azcc.gov
utildivservicebyemail@azcc.gov

Lawrence V. Robertson, Jr.
210 West Continental Road, Suite 216A
Green Valley, Arizona 85622
tubaclawyer@aol.com
Mtierny-lloyd@enemoc.com
Greg.bass@calpinesolutions.com
*Attorneys for EnerNOC, Inc. and
Calpine Energy Solutions, LLC*

Kenneth C. Sundlof, Jr.
Jennings, Strouss & Salmon, P.L.C.
One East Washington Street, Suite 1900
Phoenix, Arizona 85004-2554
sundlof@jsslaw.com
mliska@jsslaw.com
*Attorneys for Salt River Project
Agricultural
Improvement and Power District*

William P. Sullivan
Law Offices of William P. Sullivan,
PLLC
3240 East Union Hills Drive, Suite 117

Phoenix, Arizona 85050
wps@sullivan.attorney
maw@sullivan.attorney
cmoore@navopache.org
ggouker@navopache.org
rheyman@swlaw.com
tcarlson@mohaveelectric.com
jcoury@hoolcourylaw.com
*Attorneys for Mohave Electric
Cooperative,
Incorporated and Navopache Electric
Cooperative, Inc.*

Patrick J. Black
Lauren A. Ferrigni
Fennemore Craig, P.C.
2394 East Camelback Road, Suite 600
Phoenix, Arizona 85016
pblack@fclaw.com
lferrigni@fclaw.com
*Attorneys for Freeport Minerals
Corporation and Arizonans for
Electric Choice and Competition*

Marta Darby ✓
Sierra Club
2101 Webster Street, Suite 1300
Oakland, California 94612
Marta.darby@sierraclub.org
Katherine.ramsey@sierraclub.org
Sandy.bahr@sierraclub.org

Katie.chamberlain@sierraclub.org

Thomas A. Loquvam

Thomas L. Mumaw

Melissa M. Krueger

Theresa Dwyer

Arizona Public Service Company

400 North Fifth Street, MS 8695

Phoenix, Arizona 85004

Thomas.Loquvam@pinnaclewest.com ✓

Thomas.Mumaw@pinnaclewest.com

Melissa.Krueger@pinnaclewest.com

Theresa.Dwyer@pinnaclewest.com

Debra.Orr@aps.com

Kerri.Carnes@aps.com

Robert S. Lynch

340 East Palm Lane, Suite 140

Phoenix, Arizona 85004-4603

rslynch@rslynchaty.com

todd@rslynchaty.com

Michael W. Patten

Snell & Wilmer, LLP

One Arizona Center

400 East Van Buren Street, Suite 1900

Phoenix, Arizona 85004

mpatten@swlaw.com

jthomes@swlaw.com

docket@swlaw.com

bcarroll@tep.com

vnitido@trico.coop

kcathers@trico.coop

Istonge@trico.coop

mdecorse@tep.com

Attorneys for Tucson Electric Power

Company and Trico Electric Cooperative

Joseph W. Marvin

Prime Solutions Group LLC

1300 South Litchfield Road, Building

125

Goodyear, Arizona 85338

JoeMarvingpsg-inc.net

meganrubstello@psg-inc.net

Briana Kobor

Vote Solar

358 South 700 East

Salt Lake City, Utah 84102

briana@votesolar.org

maddy@votesolar.org

Karilee S. Ramaley

Salt River Project Agricultural

Improvement & Power District

P.O. Box 52025, PAB4TA

Phoenix, Arizona 85072-2025

Karilee.Ramaley@srpnet.com

Deborah.Scott@srpnet.com

Josh.Robertson@srpnet.com

Jeffrey J. Woner

K. R. Saline & Associates, PLC

160 North Pasadena, Suite 101

Mesa, Arizona 85201

jjw@krsaline.com

Douglas V. Fant

Southwestern Power Group

3610 North 44th Street, Suite 250

Phoenix, Arizona 85018

dfant@southwesternpower.com

dgetts@southwesternpower.com

twray@southwesternpower.com

W. Gregory Kelly

Frye & Kelly, P.C.

10400 Academy Road NE, Suite 310

Albuquerque, New Mexico 87111

wgk@fryelaw.us

Attorneys for Bisti Fuels, LLC

April 17, 2019

Adam L. Stafford
Western Resource Advocates
P.O. Box 30497
Phoenix, Arizona 85046
Adam.Stafford@westernresources.org
Steve.Michel@westernresources.org
Stacy@westernresources.org

Ed Brolin ✓
Just Energy
87 Hamilton Place, Suite 6F
New York, New York 10031
ebrolin@justenergy.com

Craig G. Goodman
National Energy Marketers Association
3333 K Street, NW, Suite 110
Washington, DC 20007
cgoodman@energymarketers.com
srantalaenergymarketers.com

Vicki Sandler
Arizona Independent Scheduling
Administrators Association
14402 South Canyon Drive
Phoenix, Arizona 85048
vickisandler@gmail.com

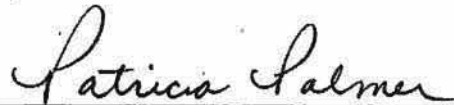
Catherine Mazzeo
Southwest Gas Corporation
P.O. Box 98510
Las Vegas, Nevada 89193-8510
Catherine.mazzeo@swgas.com
Matt.derr@swgas.com

Craig A. Marks, PLC
10645 N. Tatum Blvd.
Suite 200-676
Phoenix, AZ 85028
CraigAMarksPLC@gmail.com

Jeffrey Woner
K.R. Saline & Associates, PLC
160 N. Pasadena, Ste 101
Mesa, AZ 85201
jjw@krsaline.com

Jennifer Cranston
GALLAGHER & KENNEDY, P.A.
2575 E. Camelback Rd.
Ste 1100
Phoenix, AZ 85016-9225
lgernet@azgt.coop
jennifer.cranston@gknet.com
jwallace@gcseca.coop
JCanaca@gcseca.coop

Daniel Pozefsky
RUCO
1110 West Washington, Suite 220
Phoenix, AZ 85007
cfraulob@azruco.gov
procedural@azruco.gov
dpozefsky@azruco.gov
jfuentes@azruco.gov


Patricia Palmer