

CPUC R.9-08-009
EV Submetering Roadmap Working Groups

Green Power Institute Comments on Roadmap Presentation from 12/16/2011

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December 21, 2011

I. Introduction

The Green Power Institute (GPI) appreciates the chance to comment on the draft roadmap documents presented by the utilities on 12/16/2011.

II. Comments

a. Guiding principles

GPI agrees with the utilities that guiding principles should be clearly defined and followed in completing the Roadmap. We note, however, that a number of important principles that have not been included, such as:

- Ratepayer interests, including environmental interests, should be protected first and foremost in creating new rules for accelerated EV adoption
- The Roadmap and accompanying use cases should describe the most likely scenarios first (including, first example, net metering, which is likely to be a very common scenario for submetering)
- The Roadmap must respect the balance the Commission has struck with respect to ensuring healthy competition between IOUs and EVSPs, to the benefit of ratepayers

b. A clearly defined criteria-based approach should be followed in completing the Roadmap

The Roadmap should also clearly describe criteria used in coming up with the use cases and other lists. As is, the criteria have not been described, and clear answers were not provided by the utilities at the 12/16 workshop on this issue.

c. All timeframes suggested in the Roadmap need to be clearly defined

Similarly, the timeframes in the Roadmap need to be clearly defined. As is, the draft documents list only short-term, mid-term and long-term action items, with no reference to what these terms mean. It is not possible for parties to weigh in on the merits of these classifications without attached a clear timeframe to these names. Even if the timeframes are not firm, it is necessary for clear timeframes to be estimated.

d. It is premature for the Roadmap to deem issues out of scope in developing the Submetering Protocol

The draft document deemed a number of important issues out of scope (p. 33 of the presentation), including a number of issues that had been previously identified as in scope, at least tentatively.

GPI feels strongly that it is premature for the utilities to deem any issue out of scope, particularly when there is disagreement among stakeholders on particular issues. We note also that the presentation relied on Adam Langton's statement that, for example, NEM issues were out of scope in the Roadmap. However, when we discussed this with Langton, on Dec. 19, he did not agree that he had made any statement deeming NEM out of scope from the Commission's perspective.

e. Net metering must be considered at least preliminarily in the Roadmap

The presentation also states, with respect to NEM issues, that "technology is not sufficient to provide direct PV to PEV measurement." This has not been, however, GPI's concern or intent.¹ Rather, we have raised the NEM issue many times because we expect that many customers seeking to use submetering for EVs will also have

¹ We note that slide 23 of the 12/16 presentation describes the development of a meter that can manage NEM and submetering. We support this development but it does not seem necessary in the short-term to allow NEM and submetering on the same premises with a distinct NEM meter and EV submeter.

net-metered solar panels installed on their homes. We do not intend for PV power to be billed directly to “PEV measurement,” as the utility presentation suggests. Rather, we have raised this issue because we are concerned that utilities will deem submetering and net-metering incompatible at the same site. This is clearly not the Commission’s intent. We also know, from experience with utilities in many circumstances, that utilities will read their own tariffs very conservatively and restrictively, such that if a tariff doesn’t explicitly allow a certain scenario the utility will deem it disallowed.

Accordingly, it is imperative that both the submetering protocol/tariff and net metering tariffs explicitly allow net metering and EV submetering at the same premises. There is no technical reason that we are aware of that will prevent the same customer from enjoying net metering for solar and submetering for EV charging at the same premises. It’s all a matter of accurate meters and the appropriate billing arrangement. The meters already exist so it’s only a matter of writing this arrangement into both tariffs and then making the appropriate billing changes.

It is likely that demand response issues will also be common with respect to EV submetering because many businesses now have some kind of demand response program. If demand response programs are deemed to prevent EV submetering at the same premise, the same chilling effect on EV adoption may occur as discussed above with respect to NEM.

These issues highlight Section II.b of these comments: the Roadmap needs to include clearly defined criteria for what is to be considered or not considered in the Roadmap.

f. Enforcement of submetering protocol and tariff by CPUC should be assumed

The utility 12/16 presentation states on p. 8: “Phase 2 orders development and adoption of submetering protocol by IOUs, but does not assert jurisdiction to enforce it against third-parties or to adjudicate billing disputes among utilities, third parties and customers.”

GPI feels that the utilities should simply assume at this point that the Commission will assert jurisdiction on this issue, lacking any evidence to suggest otherwise. It would appear to make little sense for the Commission to direct the creation of the submetering protocol and tariff and not then enforce issues with respect to these documents.

The same page of the presentation suggests that the Commission should clarify its enforcement jurisdiction before further protocol development takes place. GPI strongly disagrees with this statement. Rather, protocol development should

continue apace under the assumption that the Commission does indeed have jurisdiction in this area.

g. The Roadmap should consider EVSP use cases

The 12/16 presentation states (p. 9): “The protocol will not address EVSP third party business models or EVSP third-parties’ owned submeters until later phase of proceeding after HAN implementation plans and open national standards have been agreed to by stakeholders.”

GPI also strongly disagrees with this statement. It is becoming increasingly clear that the utilities see EVSPs as a threat to their business interests with respect to the nascent EV market. The utilities’ suggestion to defer EVSP business model scenarios or use cases to a later phase of the proceeding – undefined in terms of the preferred timeframe – is not acceptable given the Commission’s precedent on this issue. The Commission has made it clear in its decisions that it desires to ensure healthy competition between IOUs and EVSPs in this new market. It is not appropriate for the IOUs to attempt to place roadblocks in the path of EVSP business models without reasonable cause. The rationales offered thus far by the utilities lack sufficient support. The Roadmap should describe and consider all likely use cases and defer judgment as to timeframes for development until the protocol phase.