California Public Utilities Commission Submetering Protocol Roadmap Development Update

December 16, 2011

As Directed by Alternative-Fueled Vehicle Proceeding R.09-08-009, Decision 11-07-029 Ordering Investor-Owned Utilities To Develop Protocols To Support The Use Of Customer-Owned Submeters For Use In Billing EV Load









Welcome

Meeting Purpose and Objectives

Provide a status update of the joint stakeholder effort to develop a submetering protocol roadmap for the CPUC.

In today's meeting we will review and discuss:

- Submetering Protocol background and status
- Joint IOU perspectives, open issues, consumer protection questions, and guiding principles
- Various Use Cases identified by the working teams
- Preliminary Roadmap
- Issues still to be resolved/clarified
- Closing and Next Steps







CPUC Submetering Protocol Timeline



Welcome

- Joint-IOU submeter protocol report must address the following issues:
 - Use of submeters in various locations
 - Technical performance requirements for submeters
 - Minimum communication functionality and standards
 - Support and protect the security and privacy of EV user data collected by utilities and third party entities
 - Methodology for settling disputes
 - Compliance with national standards for measurement and communication functions
 - Rules for incorporating subtractive billing into submetering tariffs







Welcome

Report on Activity Since November 10 Kickoff

- Filed a Joint IOU workshop report on November 14 to memorialize the workshop
- Formed four teams made up of more than 100 utility, State of California, and 3rd party organizations to develop a submetering protocol roadmap due December 31
- Held 5 weeks of team meetings to discuss submetering requirements and open issues
- Provided initial input on consolidated submetering requirements and issues to address the 7 guidelines of the protocol
- Responded to a CPUC Data Request
- Began to analyze the feasibility of various use cases identified
- Began draft reviews of the IOU protocol roadmap report







JOINT IOU PERSPECTIVES OPEN ISSUES, CONSUMER PROTECTION QUESTIONS, GUIDING PRINCIPLES

Open Issues for Roadmap

- Insufficient and uncertain development of third-party EV charging markets to determine consensus use-cases to automate IOU-third party subtractive billing processes until market more fully developed and third-party EVSP business needs more certain
 - Mitigation strategy: phased implementation with manual processes and non-revenue grade submetering in near-term, third party-supported, revenue-grade subtractive billing in longer-term
- Communications interface and national standards including HAN implementation not ready yet
 - Mitigation strategy: Coordinate with and complete HAN implementation and open SEP 2.0 national standards prior to EV submetering protocol
- Enforcement of submetering protocol uncertain under Phase 2 decision (CPUC vs. Dept. Food & Agriculture)
 - Mitigation strategy: the CPUC needs to clarify the Phase 2 decision and establish its enforcement authority for the submetering protocol, including meter inspection and maintenance and resolving consumer complaints and disputes







Consumer Protection Questions

- What is the CPUC's jurisdiction over submetering protocol and subtractive billing?
 - 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
 - Phase 2 decision defers to Dept. Food & Ag to regulate and certify meter accuracy
- Because the decision is unclear as to the CPUC's jurisdiction, the CPUC should clarify its Phase 2 decision to provide for enforcement authority prior to moving forward with further submetering protocol development







- Guiding Principles for Clarification of EV Submetering Protocol Development
 - Submetering protocol will focus on matters within CPUC jurisdiction because the CPUC must enforce the protocol and resolve disputes among utilities, EVSPs and customers
 - For example, the protocol will focus on how submeters may be used in lieu of IOU separate meters for IOU billing purposes in accordance with similar standards and protocols used for customer-owned separate meters under DA program
 - The protocol will not address EVSP third party business issues, such as the terms and conditions of a third party's sale of electricity for use as EV fuel because the CPUC (in its Phase 1 decision) determined it will not regulate the terms and conditions of third party fuel sales.
 - The protocol will address the rights and obligations of IOUs, customers and third parties as to the use of submeters by customers and IOUs for IOU billing purposes







- Guiding Principles for Clarification of EV Submetering Protocol Development
 - The protocol will be documented in CPUC-approved tariffs and associated technical documents
 - The IOUs continue to have the right to install separate meters (not submeters) for separate customers because the IOUs have obligations to accurately bill their customers
 - For customer-owned submeters used by IOUs for billing, meter reading and/or meter maintenance may be offered by the IOU or by qualified third parties consistent with DA model
 - Billing disputes will continue to be resolved by the CPUC the same as billing disputes generally
 - IOU costs associated with the use of submetering or parallel metering for IOU billing purposes will be subject to review and cost recovery approval by the CPUC, the same as other utility costs of service







TEAM PRESENTATIONS

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Use Cases

These use cases were designed for technical discussion purposes only. They are not intended to reflect IOU preference, endorsement, feasibility or capability.

• Overview

- 1: Residential (Basic)
- 2: Residential (Multiple EVs)
- 3: Small Multi-Dwelling Unit (MDU)
- 4: Large Multiple Meter / Commercial Use
- 5: No 3rd Party Involvement
- 6: Residential (Basic) w/ EVSP
- 7: Residential (Multiple EVs) w/ EVSP
- 8: Small Multi-Dwelling Unit (MDU) w/ EVSP

- 9: Large MDU (Garage) w/ EVSP
- 10: Standard (MSub)
- 11: In Parallel (FSub + MSub)
- 12: In-Series w/o Cross Talk (FSub + MSub)
- 13: In-Series w/ Cross Talk (FSub + MSub)
- 14: In-Series (2 MSubs)
- **15:** AMI
- 16: Direct OpenEV







Use Cases

Preliminary Assessment of Use Case Timing

- Implementation analysis will provide further insight into more specific timing



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Billing & Regulatory Requirements

• Summary of Required Action Steps, Responsibility, and Time Estimates

Amend tariffs or develop new rules

- Identify needed tariff provisions e . g registration, enrollment, billing arrangements, fees, dispute resolution, technical performance, eligibility, etc. implied by the protocol
- Modify tariffs (rate schedules and rules) or create a new tariff (a new rule with reference to a technical protocol, or other solution) to align with approved Protocol
- Develop any new technical protocol documents via working process as well as new forms to file with Commission
- File Tier 2 Advice Letter
- Anticipate and avert t othe extent possible challenges caused by the complexity of customer-MSP-utility relationships
 - Define roles and responsibilities, rights and obligations, and performance expectations
 - Identify, describe, and develop mitigation steps for anticipated disputes
 - Identify and describe incremental infrastructure needed to address disputes
 - Review adequacy of existing rules and file new rules as necessary







Billing & Regulatory Requirements

• Summary of Required Action Steps, Responsibility, and Time Estimates

- Anticipate and avert t othe extent possible challenges caused by the complexity of submetering data collection and subtractive billing for DA and CCA customers
 - Identify rights and obligations of DA customers, CCA customers, and MSPs
 - Expand dispute resolution approaches and steps to address DA and CCA customers
- Anticipate and avert t othe extent possible challenges caused by the complexity of combining submetering and NEM services, determining:
 - The technical and regulatory feasibility of combining NEM and submetering services.
 - Measurement needed to integrate NEM and PEV Submetering
 - Tariff requirements resulting from integration
 - Technology capabilities needed to process integrated billing
 - Expand dispute resolution approaches and steps to address NEM customers







Billing & Regulatory Requirements

- Summary of Required Action Steps, Responsibility, and Time Estimates
 - Establish requirements for certification of Data Management Agents providing data for billing purposes
 - IOUs provide recommendations based on Direct Access experience
 - MSPs define requirements and implement policies and procedures
 - CPUC and CDFA/DMS do not have authority in this area
 - Utilities must determine how to recoup incremental costs associated with submetering
 - Identify incremental metering, billing, customer service, and information system costs associated with submetering and submetering by DR, DA, CCA, and NEM customers
 - Identify capital and O&M investments associated with new requirements, and determine whether submetering-related costs are:
 - Incremental or already accounted for in the GRC
 - Overlapping with costs included in MSP business models





SDGE

Submetering Technical Requirements, Compliance, and Standards

- Summary of Required Action Steps, Responsibility, and Time Estimates
 - Develop technical performance and functional design requirements and standards
 - IOUs define in functional design requirements documentation the configuration, usage, and billing parameters necessary to support submetering and subtractive billing, including:
 - Format of usage information
 - Percent error tolerance
 - Submeter/utility meter time and date synchronization methods
 - Local meter reading requirements
 - Meter data estimation requirements
 - CDFA/DMS assumes responsibility for adopting specifications and establishing requirements, with technical support from IOUs and MSPs
 - MSPs assume responsibility for implementation of technical requirements, compliance, and standards







Submetering Technical Requirements, Compliance, and Standards

- Summary of Required Action Steps, Responsibility, and Time Estimates
 - Establish processes to certify and audit submeters and related submetering equipment and sites
 - CDFA/DMS develops certification and audit processes and policies, including:
 - Sampling
 - Testing
 - Recertification
 - How submeter manufacturers can self-certify the submeter
 - How accuracy audits can occur with submeters embedded in other equipment
 - How EVSE, cordset, and automaker submeter manufacturers submit:
 - » New meter types for initial certification
 - » New products as sold to County Weights and Measures
 - » Operating submeters for re-certification
 - IOUs provide functional design requirements documentation
 - IOUs and MSPs provide technical support





SDGE

Submetering Technical Requirements, Compliance, and Standards

• Summary of Required Action Steps, Responsibility, and Time Estimates

- Establish requirements for installation, maintenance, and testing of submeter and related equipment compatible with utility meter usage data
 - IOUs provide direction to MSPs on key requirements and how to work effectively with utilities, including recommendations for:
 - De-energizing circuits during submeter installation
 - Associating each submeter with a particular premises meter/account and network (registration) in fixed and mobile meter scenarios
 - Establishing communication between submeter and premises meter
 - MSPs assume responsibility for defining and implementing submeter and related equipment installation, maintenance, and testing requirements, including determining how to:
 - Obtain data for verification purposes
 - Recognize when a meter is out of tolerance
 - Fix/update submeter software, firmware, and hardware
 - Handle reconfigurations based on changes in utility rates and programs
 - Test and verify submeter testing equipment





Submetering Technical Requirements, Compliance, and Standards

- Summary of Required Action Steps, Responsibility, and Time Estimates
 - Establish requirements for certification of submeter workers/providers
 - IOUs provide recommendations for worker requirements
 - DMS develops guidelines
 - MSPs develop and implement worker training, certification, and auditing processes and content









Submetering Technical Requirements, Compliance, and Standards

• Summary of Required Action Steps, Responsibility, and Time Estimates

- Establish requirements to address safety risks for customers, workers, and equipment
 - MSPs map existing standards to the type of device based on electrical and connection parameters
 - CDFA/DMS establishes equipment safety requirements
 - Building code departments establish installation safety requirements
- Establish requirements for submeter reliability
 - CDFA/DMS and CCWM collaborate with submeter manufacturers on:
 - Developing a reliability statement and parameters specifying requirements for submeter accuracy throughout its expected life
 - CDFA/DMS and CCWM also:
 - Investigate whether meter recertification should be more often than 10 years
 - Build reliability requirements into CDFA/DMS testing, certification, and auditing policies and procedures







Submetering Technical Requirements, Compliance, and Standards

• Key Issues, Conclusions, and Decisions

- Significant collaboration between the IOUs, submeter manufacturers, automakers, and California inspection and certification authorities will continue throughout the submetering protocol development process, with:
 - IOUs providing technical requirements, guidelines, recommendations, and support to MSPs, CDFA/DMS, and CCWM offices
 - CDFA/DMS and CCWM offices developing equipment accuracy, reliability, installation, testing equipment, worker, and safety requirements based on both IOU and MSP input
 - MSPs engineering functionality and building equipment meeting the requirements of CDFA/DMS and CCWM and factoring in the recommendations of the IOUs







Submetering Technical Requirements, Compliance, and Standards

Key Issues, Conclusions, and Decisions

- To future-proof submeter designs, functionality should include:
 - Bi-directional capabilities enabling vehicle-to-grid functionality
 - Demand response capabilities enabling load control
 - NEM capabilities enabling the combined measurement of self-generation and battery charging
 - Remote firmware and configuration update capabilities
- CDFA/DMS and CCWM have not in the past worked with time of use submeters, submeters embedded in other equipment, or submeters relying on remote communication
 - Putting the required certification, testing, auditing, and recertification requirements, processes, and policies could take a considerable amount of time







Submetering Communication Functionality, Standards, Security

- Summary of Required Action Steps, Responsibility, and Time Estimates
 - Establish an interface between MSPs and utilities to share 3rd party submetering data for billing purposes
 - EV profile will be drafted within Communications team and provided to OpenSG OpenADE
 - Develop 3-way submetering contract for 3rd party submetering
 - The actual three-way contract is most likely to be implemented via a web-portal and should include agreements, disclaimers etc. and stored electronically with the Data Custodian (Data Custodian needs to be determined)
 - What is the role of the communications team vs Billing/Regulatory to set requirements, write up contracts (Terms and Conditions)?
 - Identify requirements for revisions to ESPI (e.g., advanced use cases)?
 - Facilitate the implementation of an ESPI submetering profile on utility and MSP systems
 - Ensure testing, certification, interoperability, security
 - Scope of team related to testing, certification, and security/privacy TBD







Submetering Communication Functionality, Standards, Security

• Summary of Required Action Steps, Responsibility, and Time Estimates

- Participate in UCAlug and OpenSG OpenADE committees and activities to maximize time and efforts
 - ESPI conformance certification and interoperability
 - Interoperability testing
 - Test plan and requirements
 - Other necessary submetering profile work (requirements identification, revisions, etc.)
- Communication standards for submeters
 - Define which use cases could involve standardized communications
 - Determine how requirements defined, put in place, and enforced (contractual agreements, privacy and security, certification, etc.)







Submetering Communication Functionality, Standards, Security

- Summary of Required Action Steps, Responsibility, and Time Estimates
 - Establish mechanisms to assure privacy and security of customer and energy consumption data, determining:
 - Who owns the "global effort" of ensuring data security
 - What level should be attained (e.g., HIPAA, PCI credit cards)
 - Responsibility and where this work should be completed
 - Whether existing standards available or in place are sufficient
 - Other (Liability, connection to ongoing CPUC work, scope, etc.)







Submetering Communication Functionality, Standards, Security

• Key Issues, Conclusions, and Decisions

- Developing communication functionality for the submetering protocol is best served by leveraging existing standards and standards development organizations, including...
 - NAESB ESPI
 - OpenSG OpenADE
 - UCAlug
 - Oauth

...as well as benchmarking functionality and security approaches used in other industries:

- HIPAA
- PCI







PRELIMINARY ROADMAP

Preliminary Protocol Development Roadmap

High-Level Approach

- Phase 1 D e fin e / Pfoatthe protocol
 - Define the Submetering Protocol Roadmap
 - Goals, objectives, scope, guidelines
 - List of Issues and/or Requirements and Preliminary Recommendations
 - Key tasks or activities and timing for each
 - Responsible organizations and individuals for each
 - Complete and submit the Submetering Roadmap Report
- Phase 2 Design/Develop California Submetering Protocol
 - Need to complete market assessment and cost effectiveness criteria regarding 3rd party product, service, market plans, and customer needs
 - Based on market assessment and cost-effectiveness criteria, choose preferred use case(s) and:
 - Develop business requirements and specs for utilities, customers and 3rd party meter service providers
 - Develop technical, security, privacy requirements, specs, and standards aligned with national standards
 - Develop architectural design for end-to-end systems (including back office integration)







Preliminary Protocol Development Roadmap

• High-Level Approach (continued)

- Phase 3 O b t a CPUC Authorization and Cost Recovery to Build Interim Solution During EV Market Development Period (2013-2016)
 - Build, test, and refine the necessary processes, systems, and system interfaces
 - Pursue development of national standards for submeters and subtractive billing
 - Establish tariff governing utility, customer, and 3rd party meter service providers
 - Develop certification process for 3rd party devices, systems, processes
 - Develop and carry out customer information campaign
- Phase 4 Build Scalable Long-Term Solution to Support Mature EV Market (Post- 2015) Consistent with Other IOU Smart Grid Functionality
 - Upgrade utility systems to handle automated, standardized communications and billing services if supported by EV market participants











3RD Party Open Issues and Questions

Question / Issue	Recommendation / Decision	Identified By
Is incorporating Demand Response controls and capabilities into the Submetering Protocol in scope?	Not included in scope of OIR. Determine the necessary steps to implement DR load controls from the technical (standards / communications) and regulatory perspectives for inclusion in future use cases.	Sustainable Unlimited Mobility, Project Green On Ramp & Community Renewable Solutions
Is incorporating Net Energy Metering (NEM) into the Submetering Protocol in scope?	Not included in scope of OIR. Additionally, current net metering process and technology is not sufficient to provide direct PV to PEV measurement	Sustainable Unlimited Mobility, Project Green On Ramp & Community Renewable Solutions
Quick Charge / DR Research - QC installations would be highly desirable to implement as submetered installs	Not included in scope of OIR. Additionally, US standards for quick charge plug not yet developed. Retain for consideration in 2012 Protocol Development Process	Sustainable Unlimited Mobility, Project Green On Ramp
Could there be submeters on submeters, as in mobile home park residents charging EVs?	Not included in scope of OIR. Retain for consideration in 2012 Protocol Development Process	Sustainable Unlimited Mobility, Project Green On Ramp
Should the roadmap report address potential grid savings resulting from the use of submeters to record and communicate EV charging loads?	Not included in scope of OIR. Retain for consideration in 2012 Protocol Development Process	Sustainable Unlimited Mobility, Project Green On Ramp
Will this protocol look at Vehicle to Grid capabilities?	Not included in scope of OIR. Retain for consideration in 2012 Protocol Development Process	Sustainable Unlimited Mobility, Project Green On Ramp









Conclusions

- Working group efforts since the October 27 workshop have only reinforced the IOUs' early hypotheses:
 - Many uncertainties and complexities will need to be overcome to develop and implement a submetering protocol
 - The needed communications interface is not yet available
 - The AMI and billing systems of the IOUs are not capable of providing "revenue grade" submetering for subtractive billing purposes to third-parties who are not the customer of record, such as MSPs
 - EV penetration has been limited to date and has not justified the cost of automating IOU subtractive billing
 - The emerging submetering market will grow slowly until technological advances provide customers with low cost, innovative solutions
 - While the teams attempted to address all the issues identified, in the coming months, further work will be required as the roadmap report cannot fully resolve all of them
 - A phased development approach offers the best strategy for enabling the submetering of EV load while matching development costs with actual, evolving marketplace demand







Next Steps

- Complete CPUC Data Request by December 20, 2011
- Complete feasibility analysis of use
- Finalize protocol roadmap and submit to CPUC on January 3, 2012
- 3rd parties and CPUC to provide comments once roadmap is submitted







USE CASES

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- Use Case 1: Residential Use Case (Basic)
 - This use case consists of one submeter (FSub) on one Premise.
 - The Premise Owner is the Customer of Record.
 - Submeter reading services are outsourced to a 3rd Party, who reads the FSub and transfers usage data from its Data Management System (DMA) to the Utility.



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- Use Case 2: Residential Use Case (Multiple EVs)
 - This use case consists of multiple FSubs on one Premise
 - The Premises Owner is the Customer of Record
 - Submeter reading services are outsourced to a 3rd Party, who reads each FSub and transfers usage data from its DMA to the Utility



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Use Cases

Use Case 3: Small Multi-Dwelling Unit (MDU) Use Case ۲

- This use case consists of multiple ***** Master Meters (MM) on one Premise.
- The Premise Owner is the 10100303055 Customer of Record.
- Submeter reading services are outsourced to a 3rd Party, who reads each FSub and transfers usage data from its DMA to the Utility.









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Use Cases

• Use Case 4: Large Multiple Meter / Commercial Use Case

- This use case consists of multiple
 FSubs on one Premise
- The Premises Owner is the Customer of Record.
- Submeter reading services are outsourced to one of many 3rd Parties, who reads each FSub and transfers usage data from its DMA to the Utility.
- No 3rd Party Fuel Supplier
 (Bundled Service Customer)









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Usage Data

* * *

Use Cases

Use Case 5: No 3rd Party Involvement

- This use case consists of one FSub on one Premises.
- The Premises Owner is the Customer of Record.
- Submeter reading services are not outsourced to a 3rd Party. Instead, the Utility reads the FSub using a utility-defined solution.

Note: The various configurations represented in all prior Use Cases can also be applied to this Use Case.



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Use Cases

• Use Case 6: Residential Use Case (Basic) w/ EVSP

- This use case consists of one FSub on one Premises.
- The 3rd Party, or EVSP, is the Customer of Record. In this use case, 3rd Party and EVSP are the same entity
- Submeter reading services are outsourced to the 3rd Party, who reads the FSub and transfers usage data from its DMA to the Utility. As an EVSP, the 3rd Party may also provide valueadded services to Premises 1 account



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Billing Master Meter Read Submeter Usage

Use Cases

- Use Case 7: Residential Use Case (Multiple EVs) w/ EVSP
 - This use case consists of multiple FSubs on one Premises.
 - The 3rd Party, or EVSP, is the Customer of Record. In this use case, 3rd Party and EVSP are the same entity.
 - Submeter reading services are outsourced to the 3rd Party, who reads the FSub and transfers usage data from its DMA to the Utility. As an EVSP, the 3rd Party may also provide value-added services to Premises 1 account.



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Master Meter Read Submeter Usage

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Use Cases

Use Case 8: Small Multi-Dwelling Unit (MDU) Use Case w/ EVSP ۲

- This use case consists of multiple Master Meters (MM) on one Premises.
- The 3rd Party, or EVSP, is the Customer of Record.
- Submeter reading services are outsourced to a 3rd Party, who reads each FSub and transfers usage data from its DMA to the Utility. As an EVSP, the 3rd Party may also provide value-added services to Premises 1 account.









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Use Cases

• Use Case 9: Large MDU Use Case (Garage) w/ EVSP

- This use case consists of multiple FSubs on one Premises.
- The 3rd Party, or EVSP, is the Customer of Record.
- One of many 3rd Parties performs submeter reading services, i.e., reads the FSub and transfers usage data from its DMA to the Utility.









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Use Cases

• Use Case 10: Standard Use Case

 Mobile Submeter (MSubB1) is associated with Premises 1 Account and appropriately charging. No other submeters are present.



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Use Cases

• Use Case 11: In Parallel Use Case (FSub + MSub)

Mobile submeter (MSubB1) is associated with Premises 1 Account. FSubA1 is present.
 Mobile submeter (MSubB1) charges appropriately. Both submeters provide information to the utility.



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- Use Case 12: In-Series Use Case w/o Cross Talk (FSub + MSub)
 - Mobile submeter (MSubB1) is not associated with Premises 1 Account. FSubA1 is present.
 MSubB1 charges at FSubA1 instead of charging at its designated location. Cross Talk Not Present.



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- Use Case 13: In-Series Use Case w/ Cross Talk (FSub + MSub)
 - Mobile submeter (MSubB1) is associated with Premises 1 Account. FSubA1 is present.
 MSubB1 charges inappropriately at FSubA1 creating a duplicative scenario. Cross Talk present.



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- Use Case 14: In-Series Use Case (2 MSubs)
 - Separate mobile submeters both in the vehicle and cordset send us two numbers for the same transaction/charging.



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Use Cases

- Use Case 15: AMI Use Case
 - Customer owned submeter communicates submeter data to the utility via the utility's AMI system.



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Use Cases

• Use Case 16: Direct OpenEV Use Case

Customer owned submeter communicates submeter data to the utility via a direct OpenEV connection.

