

From: Gupta, Alope

Sent: 8/30/2013 3:34:00 PM

To:

Redacted

Cc: Dietz, Sidney (/O=PG&E/OU=Corporate/cn=Recipients/cn=SBD4)

Bcc:

Subject: RE: HAN for small commercial?

Redacted

I appreciate the detailed response, but I am still not sure we have a clear picture. Let's break this down in different parts.

Much of the response below deals with C&I customers (presumably customers with >200 kW demand); however, my original inquiry only concerned SMB customers <200 kW, and still does. So, let's limit our discussion to these customers (and exclude references to C&I >200 kW).

Your first response indicated that SMB customers (presumably, <200 kW) ARE eligible for HAN, EXCEPT for certain tariffs and a certain problematic SM (due to the GE/SSN issue with handling NEM). This seems contrary to expectations.

The only case where we would expect HAN ineligibility involves an SMB customer with KV2C on a NEM account.

If the SMB customer <200 kW has the problematic SM but is NOT a NEM account, I presume they would be HAN eligible. Please confirm this is the case.

If the SMB customer <200 kW is on the six tariffs listed below and has an eligible SM (including GE KV2C with a non-NEM account), again the presumption is that they are HAN eligible. Please confirm this is the case.

If above is not the case, that is, the SMB customer <200 kW is being blocked by PG&E simply because of a certain tariff (regardless of meter type) we would find this to be problematic, unless PG&E can offer some explanation for why customers on those tariffs should not be allowed to access HAN. If the explanation is that HAN “is not a good fit” for these customers (or that they may have other better options), this would not be satisfactory and our opinion would be that this practice is not consistent with CPUC decisions.

We may need to have another call or meeting to address this issue as the thread may be getting confusing.

In the meantime, we should all have a great weekend!

Aloke Gupta

California Public Utilities Commission

O: 415.703.5239
aloke.gupta@cpuc.ca.gov

From: [Redacted]
Sent: Friday, August 30, 2013 2:05 PM
To: Gupta, Alope; [Redacted]
Subject: RE: HAN for small commercial?

Hi Alope,

Sorry, it is rather confusing – here’s some more information that I hope will help clarify things:

HAN is a product for residential and SMB customers. This was confirmed by the Commission in Resolution E-4527 (HAN Implementation Plan Resolution). Page 16 states:

“Regarding the protestor’s issue with addressing data access for Commercial & Industrial customers with greater than 200 kW demand, we agree with SCE’s argument in its reply that the scope of the AMI deployment authorized by prior CPUC decisions, **including the HAN interface capability, was limited to customers with less than 200 kW demand.**”

There are several reasons why C&I customers are not a good fit for HAN.

- C&I customers typically have their meter far from the premise or from where the HAN device would be located. As with any wireless technology, HAN devices have a range limitation – we advise up to 75 feet from the meter. The actual range is a factor of distance and sources of interference.
- C&I customers have used energy management technologies/systems for years. HAN is a product to expand energy management capabilities to mass market customers.
- Currently, most ZigBee devices are not designed for C&I customers.

Our process is to first look at the customer’s tariff to determine if a customer is an SMB customer (i.e. C&I tariffs & customers are ineligible). Then, as we do for all interested customers, we look at their meter type to determine if their meter is eligible.

As for NEMS, there are 44,686 existing customers and an additional 17,337 who have recently signed up (for a total of 62,023 total NEMs SmartMeters as of August 10, 2013). NEMS are not eligible for HAN because we have only GE NEMs meters in the field, and are in the process of resolving the instantaneous demand issue with them and SSN; we will provide a recommended path forward on that this Tuesday.

Please let me know if I can help with anything else. And enjoy the long weekend!

Redacted

Senior Product Manager

Home and Business Area Networks

Customer Energy Solutions

Pacific Gas and Electric Company

Redacted

From: Gupta, Alope [mailto:aloke.gupta@cpuc.ca.gov]

Sent: Thursday, August 29, 2013 9:58 AM

To: Redacted

Subject: RE: HAN for small commercial?

I am not sure I understand. Are SMB customers HAN ineligible because of the tariff that they are on, AND/OR? b/c of an ineligible SM? If it's the latter, why are we blocking on the basis of tariff?

Also, while we are on this, are there NEM residential customers on the eligible meter types. We would like to complete the question from the meeting:

-how many total NEM residential customers currently (say as of 8/1 or other convenient date)

-how many have SM; and of these, how many have HAN eligible SMs.

Alope

From: Redacted

Sent: Thursday, August 29, 2013 9:32 AM

To: Gupta, Alope; Redacted

Subject: RE: HAN for small commercial?

Hi Alope,

Small/medium businesses are indeed eligible for HAN – the only tariffs not eligible are E19, E20, AG4, AG5, A1, A6, A10, and AG1. Below are the meters small/medium businesses are likely to have; the only one that isn't currently eligible is the GE KV2C due to performance issues (per my earlier email, attached here). We're actively working to resolve those issues.

Manufacturer	Model	Eligible
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Landis+Gyr

GE I210+DSH Yes

GE KV2C No

Let me know if you have any other questions. Thanks!

Redacted

Senior Product Manager

Home and Business Area Networks

Customer Energy Solutions

Pacific Gas and Electric Company

Redacted

From: Gupta, Alope [mailto:aloke.gupta@cpuc.ca.gov]

Sent: Wednesday, August 28, 2013 12:50 PM

To: Redacted

Subject: HAN for small commercial?

Hello

Can you clarify whether PG&E is currently allowing HAN activations for commercial accounts < 200 kW. If not, can you give more background on this. Thanks.

Alope Gupta

California Public Utilities Commission

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