

**BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF CALIFORNIA**

Order Instituting Rulemaking to Consider  
Alternative-Fueled Vehicle Programs, Tariffs, and  
Policies.

Rulemaking 13-11-007  
(Filed November 14, 2013)

**COMMENTS OF THE MARIN ENERGY AUTHORITY  
ON ALTERNATIVE-FUELED VEHICLES OIR  
AND RELATED VEHICLE-GRID INTEGRATION REPORT**

Jeremy Waen  
Regulatory Analyst  
**MARIN ENERGY AUTHORITY**  
781 Lincoln Avenue, Suite 320  
San Rafael, CA 94901  
Telephone: (415) 464-6027  
Facsimile: (415) 459-8095  
E-Mail: [jwaen@marinenergy.com](mailto:jwaen@marinenergy.com)

December 13, 2013

## TABLE OF CONTENTS

<b>I.</b>	<b>INTRODUCTION .....</b>	<b>1</b>
<b>II.</b>	<b>BACKGROUND .....</b>	<b>1</b>
<b>III.</b>	<b>THE ROLE OF CCAS MUST BE CONTEMPLATED WITHIN THE OIR AND THE ENERGY DIVISION VEHICLE-GRID INTEGRATION REPORT .....</b>	<b>2</b>
<b>A.</b>	<b>VEHICLE-GRID INTEGRATION .....</b>	<b>3</b>
1.	<i>Is the VGI framework proposed in the White Paper a reasonable way to organize VGI activities and scenarios? .....</i>	3
2.	<i>Do you agree with Energy Division's prioritization of the VGI scenarios? .....</i>	3
3.	<i>Does the White Paper capture all the utility regulatory barriers to VGI? .....</i>	3
4.	<i>How should we address any potential safety and reliability concerns associated with VGI? .....</i>	4
<b>B.</b>	<b>ALTERNATIVE FUEL VEHICLE RATE DESIGN POLICY .....</b>	<b>4</b>
1.	<i>What is the utility experience to date regarding customer election to use PEV-specific tariffs? .....</i>	4
2.	<i>What issues need to be considered when designing PEV rates for residential charging? .....</i>	4
3.	<i>Should the Commission consider new rate tariffs for workplaces providing PEV charging? .....</i>	4
4.	<i>How can residential and workplace PEV rates incentivize smart charging and allow controlled charging? .....</i>	5
5.	<i>How should the Commission address demand charges for medium - and heavy-duty plug-in electric vehicles? .....</i>	5
6.	<i>What changes, if any, are needed to tariffs related to compressed natural gas vehicles? .....</i>	5
7.	<i>What other issues related to alternative fuel vehicle rates should the Commission address? .....</i>	5
<b>C.</b>	<b>FINANCING .....</b>	<b>6</b>
1.	<i>Should the Commission direct the utilities to provide financing to customers to encourage PEV adoption? If so, what financing options should be considered? .....</i>	6
<b>D.</b>	<b>GENERAL .....</b>	<b>6</b>
1.	<i>What changes to the Commission's Rules or new Rules are needed to facilitate the goals outlined in this OIR? 6</i>	6
<b>IV.</b>	<b>CONCLUSION .....</b>	<b>6</b>

**BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF CALIFORNIA**

Order Instituting Rulemaking to Consider  
Alternative-Fueled Vehicle Programs, Tariffs, and  
Policies.

Rulemaking 13-11-007  
(Filed November 14, 2013)

**COMMENTS OF THE MARIN ENERGY AUTHORITY  
ON ALTERNATIVE-FUELED VEHICLES OIR  
AND RELATED VEHICLE-GRID INTEGRATION REPORT**

**I. INTRODUCTION**

In accordance with the November 14, 2013 Order Instituting Rulemaking (“OIR”) and guidance provided by Energy Division (“ED”) staff at the December, 4, 2013 workshop on Vehicle-Grid Integration (“VGI”) and financing (“Workshop”), Marin Energy Authority (“MEA”) submits the following comments.

**II. BACKGROUND**

MEA is a Community Choice Aggregator (“CCA”) established pursuant to California law and regulations developed by the Commission. MEA is the joint powers not-for-profit public agency authorized to administer the MCE Clean Energy (“MCE”) CCA program. MEA currently serves approximately 125,000 customer accounts throughout Marin County and the City of Richmond. While MEA customers receive generation service from the MCE CCA program, they continue to receive transmission, distribution, billing and other services from Pacific Gas and Electric Company (“PG&E”).

The purpose of the Marin Energy Authority is to address climate change by reducing energy related GHG emissions and securing energy supply, price stability, energy efficiencies

and local economic and workforce benefits. It is the intent of MEA to promote the development and use of a wide range of renewable energy sources and energy efficiency programs, including but not limited to solar and wind energy production at competitive rates for customers. GHG emissions due to transportation are significant factors within the communities served by MEA. For the County of Marin, approximately 1.5 million metric tons of CO<sub>2</sub>e are annually attributable to transportation usage (approximately 50% of the overall emissions).<sup>1</sup> For the City of Richmond, approximately 0.5 million metric tons of CO<sub>2</sub>e are emitted annually due to transportation (approximately 10% of the overall emissions with 88% being due to industry).<sup>2</sup>

MEA views the adoption and usage of electric vehicles (“EV”) and other low-carbon alternative-fueled vehicles as a vital component of the programs it provides to its service territory to facilitate the reduction of GHG emissions throughout. Not only do EVs offer the potential for reduction of GHG emissions, but also the implementation of EVs and related infrastructure provide opportunities for local economic and workforce development, which is also fundamental to MEA’s guiding principles. MEA looks forward to working with the Commission and other parties in this proceeding to better develop strategies for CCAs to facilitate the rapid deployment of EVs and other alternative-fueled vehicles.

### **III. THE ROLE OF CCAS MUST BE CONTEMPLATED WITHIN THE OIR AND THE ENERGY DIVISION VEHICLE-GRID INTEGRATION REPORT**

MEA provides select responses with a specific focus on perspective of CCAs to the issues raised by the OIR and the VGI report:

---

<sup>1</sup> Marin County Greenhouse Gas Reduction Plan (2006)  
[http://www.co.marin.ca.us/depts/CD/main/comdev/advance/sustainability/susinitatives/climate/pdf/FinalMarinGHGReductionPlan\\_Sep19.pdf](http://www.co.marin.ca.us/depts/CD/main/comdev/advance/sustainability/susinitatives/climate/pdf/FinalMarinGHGReductionPlan_Sep19.pdf). The County of Marin is currently updating this study and plans to release an update with new countywide GHG emissions data sometime in 2014.

<sup>2</sup> Richmond General Plan 2030: Energy and Climate Change (2012)  
<http://www.ci.richmond.ca.us/DocumentCenter/Home/View/8813>

## **A. Vehicle-Grid Integration**

### **1. *Is the VGI framework proposed in the White Paper a reasonable way to organize VGI activities and scenarios?***

While MEA does believe the VGI framework proposed in the VGI report, MEA agrees with comments raised by numerous parties at the Workshop that additional focus needs to be given to VIG (one-way) EV charging opportunities.

### **2. *Do you agree with Energy Division's prioritization of the VGI scenarios?***

MEA believes the prioritization of the VGI scenarios may risk being overly broad and not targeted to specific regional needs and parameters. In certain areas fleet EV usage may make the most sense as a starting point. In other areas, individual-owned EVs and day-time workplace based charging might rise to a higher priority. MEA cautions the Commission against adopting an overly prescriptive prioritization plan for VGI that has little to-no sensitivities for regional differences that may impact EV usage.

### **3. *Does the White Paper capture all the utility regulatory barriers to VGI?***

In addition to the various utility regulatory barriers presented in the VGI report, the issue of competitive neutrality must be explored. To the extent the Commission directs the Investor Owned Utilities (“IOUs”) to implement specific EV rates and programs, these rates and programs must be implemented in a manner that does not put non-IOU Load Serving Entities (“LSEs”), such as CCAs, and their customers at a competitive disadvantage. Furthermore, to facilitate widespread adoption of EVs statewide, the Commission should encourage CCAs to offer their own EV rates and programs. Any costs related to new EV rates and program costs must be allocated in a competitively neutral manner as well.

Additionally, customer usage information must be accessible to all LSEs such that they can provide charging rates that are understandable and guide customer usage in near real-time.

To date, MEA has experienced tremendous hurdles when attempting to access customer usage data for its customers, due to bureaucratic hurdles with PG&E. At this point, MEA still lacks the Advanced Metering Infrastructure (“AMI”) data necessary to fully deploy its Energy Efficiency programs. MEA foresees the equality of access to customer usage data as a significant regulatory barrier that must be resolved as well for competitively neutral deployment of EVs and EV infrastructure.

**4. *How should we address any potential safety and reliability concerns associated with VGI?***

MEA has no comment on this issue at this time.

**B. Alternative Fuel Vehicle Rate Design Policy**

**1. *What is the utility experience to date regarding customer election to use PEV-specific tariffs?***

MEA to date has had a relatively low customer participation rate in its EV -specific tariffs. MEA offers EV -A (single meter) and EV -B (separate meter) rate schedules that are similar in structure to the EV rates that PG&E offers to its bundled customers.

**2. *What issues need to be considered when designing PEV rates for residential charging?***

EV rates, to date, have focused on single-family home-based charging where the account holder has direct access to the meter(s) used to measure the EV-related usage. MEA agrees with the comments raised by other parties in the Workshop that additional attention should be provided to the multi-family and rental oriented residential EV charging.

**3. *Should the Commission consider new rate tariffs for workplaces providing PEV charging?***

MEA believes there is great potential for rate design that encourages workplace, daytime charging to help consume the excess electricity generated during these hours due to deployment of renewable electricity, particularly solar. Furthermore, participation in these rates could help to

shift demand and mitigate the need for flexible ramping generation resources and flexible capacity. For workplace charging to be leveraged in these ways, the Commission and the California Independent Systems Operator (“CAISO”) must work together to determine the signaling, grid benefit values, and funding pathways necessary to drive this behavior. Until there is a way to pass the grid-related benefits back to customers, there is no effective way to enable LSEs to offer workplace charging tariffs to their customers.

**4. *How can residential and workplace PEV rates incentivize smart charging and allow controlled charging?***

To the extent that residential and workplace EV charging rates can encourage load-shifting to periods of high supply and low demand, there can be significant grid-related benefits. Enabling these benefits and creating the opportunity for all LSEs to pass these benefits back to customers through rates is a crucial first step to encouraging smart charging and controlled charging programs.

**5. *How should the Commission address demand charges for medium- and heavy-duty plug-in electric vehicles?***

MEA has no comment on this issue at this time.

**6. *What changes, if any, are needed to tariffs related to compressed natural gas vehicles?***

MEA has no comment on this issue at this time.

**7. *What other issues related to alternative fuel vehicle rates should the Commission address?***

The Commission should work to ensure that the incentive mechanisms devised to pass grid-related benefits back to EV-charging customers preserve competitive neutrality and encourage widespread participation from all LSEs. MEA believes CCAs due to their community-focused, local government structure, are better able to answer to the needs and wants

of EV-owning ratepayers within the CCA's service territory. The Commission should encourage CCA-lead EV rates and programs to drive widespread EV adoption.

### **C. Financing**

1. *Should the Commission direct the utilities to provide financing to customers to encourage PEV adoption? If so, what financing options should be considered?*

MEA already offers financing to customers to encourage EV adoption by way of MEA's On-Bill Repayment ("OBR") program that is part of MEA's 2013 -2014 Energy Efficiency ("EE") offerings. Per the terms of these OBR loans, up to 30% of the funding granted can be applied to property retrofits beyond EE measures, including EV charging infrastructure and metering. The OBR mechanism provides a relatively low-cost, low-risk financing mechanism for the deployment of EE retrofit technologies, and it could be more intentionally adapted to apply to EV charging infrastructure. The Commission should consider all financing opportunities may help to expedite the deployment of EVs and EV-related infrastructure.

### **D. General**

1. *What changes to the Commission's Rules or new Rules are needed to facilitate the goals outlined in this OIR?*

MEA has no comment on this issue at this time.

## **IV. CONCLUSION**

MEA thanks assigned Commissioner Carla Peterman, Administrative Law Judge Irene K. Moosen, and Energy Division staff for the opportunity to provide these comments. The widespread deployment of alternative-fueled vehicles is paramount for reducing GHG emissions, throughout MEA's service territory, as well as statewide. MEA looks forward to its continued involvement in this proceeding.



Respectfully submitted,

/s/ Jeremy Waen

Jeremy Waen  
Regulatory Analyst  
**MARIN ENERGY AUTHORITY**  
781 Lincoln Avenue, Suite 320  
San Rafael, CA 94901  
Telephone: (415) 464-6027  
Facsimile: (415) 459-8095  
E-Mail: [jwaen@marinenergy.com](mailto:jwaen@marinenergy.com)

December 13, 2013