



**Brian K. Cherry**  
Vice President  
Regulatory Relations

Pacific Gas and Electric Company  
77 Beale St., Mail Code B10C  
P.O. Box 770000  
San Francisco, CA 94177

Fax: 415.973.7226

February 18, 2014

Energy Division  
Attention: Tariff Unit  
California Public Utilities Commission  
505 Van Ness Avenue  
San Francisco, CA 94102

**Subject: Reply of Pacific Gas and Electric Company (PG&E) to Protests of Joint Advice Letter 2993-E (Southern California Edison), 4343-E (PG&E), 2566-E (San Diego Gas & Electric Company) request to implement a Plug-In Electric Vehicle Sub-Metering Pilot in Compliance With Decision 13-11-002**

Dear Energy Division Tariff Unit:

Pursuant to Rule 7.4.3 of the California Public Utilities Commission's (CPUC or Commission) General Order (GO) 96-B, Pacific Gas and Electric Company (PG&E) hereby respectfully submits its reply to protests to Joint Served Advice Letters (AL) of Southern California Edison (SCE) AL 2993-E, PG&E AL 4343-E, and San Diego Gas & Electric Company (SDG&E) AL 2566-E submitted by Marin Clean Energy (MCE).

### **Background**

On November 19, 2013, the Commission issued Decision (D.) 13-11-002 modifying the Plug-in Electric Vehicle (PEV) Submetering Protocol requirements set forth in D.11-07-029 by adopting the California Public Utilities Commission Energy Division Staff Plug-In Electric Vehicle Submetering Roadmap for a two-phase pilot. Ordering Paragraph (OP) 2 of D.13-11-002 required the investor-owned utilities (IOUs) to submit a Tier 2 Advice Letter that includes: 1) the metering requirements provided by the Energy Division to the IOUs, 2) draft versions of the data format template, 3) the Submeter Meter Data Management Agent (MDMA) registration form, 4) the customer enrollment form, and 5) MDMA Service Requirements. In addition, OP 3 ordered the IOUs to submit a preliminary budget for the submetering pilots, and OP 6 ordered the IOUs to submit a timeline for the submetering pilot program evaluation process. In compliance with OP 2, 3, and 6 of D.13-11-002, the IOUs submitted a joint advice letter on January 21, 2014.

On February 10, 2014, Office of Ratepayer Advocate (ORA), Glen Canyon, MCE, The Green Power Institute (GPI) and Community Environmental Council (CEC, combined "GPI/CEC"), and ChargePoint submitted protests to the IOUs' joint Advice Letter.

PG&E's reply focuses solely on the protest submitted by MCE. The remainder of protests will be responded to in a Joint IOU filing submitted by SCE.

### **Response to Protests**

#### **A. MCE'S PROTEST OF ADVICE LETTER 4343-E ILLUSTRATES A GENERAL MISUNDERSTANDING OF THE NATURE OF THE ELECTRIC VEHICLE SUBMETERING PILOT**

In its protest, MCE argues that the Jointly Filed Electric Vehicle (EV) Submetering tariff<sup>1</sup> violates Assembly Bill (AB) 117 because it excludes Community Choice Aggregation (CCA) and their customers from participating in the EV submetering pilot. MCE is incorrect. MCE appears to not understand that 3rd party vendors, not the utilities<sup>2</sup>, are the designated entities to own, install and operate the EV submeter under the pilot because the submeter is beyond the Utilities' service point. The intent of the pilot is for the Electric Vehicle Service Providers (EVSPs), or their Meter Data Management Agents (MDMAs), to be allowed to resell or repackage EV energy use charges with their own services, which may help facilitate an EV charging market.

It is unclear in their protest whether MCE wants to participate as a third party MDMA under the pilot or simply allow its customers to participate in the pilot by signing up with the 3rd party vendors, which would provide these services. For the latter scenario, if MCE desires that its customers be allowed to use a 3rd party vendor under the pilot, changes to the billing protocols under the pilot would be required. Generally, MCE customer bills are generated and sent from PG&E within 3 days. One of these 3 days is needed for MCE to calculate its customers' bills. Because Commission D.13-11-002 authorizing the pilot allows the EV MDMA 3 days to provide their data to the utilities for subtraction, MCE customer bills necessarily would be delayed. Also, CCA customers are billed through a different system than bundled service customers. PG&E would require modifications to that system, and time, to allow for subtractively billing these customers under the pilot.

If MCE wants to directly participate as an MDMA for its customers, MCE would need a Commission waiver of the notice requirements for such participation. MCE did not provide the required "Notice of Intent"<sup>3</sup> to participate in the Pilot in this fashion, and therefore would need specific approval by the Commission. However, as PG&E discussed with MCE on October 14, 2013, PG&E is willing to work with MCE on participation options if it makes clear it wishes to participate in the program and in what capacity. At the October 14, 2013, meeting with PG&E, MCE was non-committal on its participation.

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<sup>1</sup> PG&E's Advice Letter 4343-E

<sup>2</sup> Decision 11-07-029, Section 6.6.2

<sup>3</sup> Due to the Commission by January 3, 2014

The EV pilot as funded by Electric Program Investment Charge (EPIC) is designed to test the communication channels between the MDMA and the utility, and confirm the utility's subtractive metering capabilities. These features can be tested in the pilot regardless of whether MCE or its customers directly participates, and PG&E will make the results of the pilot generally available to stakeholders including MCE, consistent with the non-discrimination requirements of the EPIC program.

**Conclusion**

Based on the discussion above, the Commission should disregard the protest and approve AL 4343-E as filed.

Sincerely,

Handwritten signature of Brian Cherry in cursive script.

Vice President, Regulatory Relations

cc: Edward Randolph, Energy Division  
Noel Crisostomo, Energy Division  
Adam Langton, Energy Division  
Jeremy Waen, Marin Clean Energy