

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

Application of San Diego Gas & Electric Company (U 902 E) for Approval of its Electric Vehicle-Grid Integration Pilot Program.	Application 14-04-014 (FILED April 11, 2014)
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**PROTEST OF SAN DIEGO CONSUMERS' ACTION NETWORK (SDCAN) TO
APPLICATION OF SAN DIEGO GAS & ELECTRIC COMPANY (U 902-E)
FOR AUTHORITY TO IMPLEMENT A PILOT PROGRAM FOR ELECTRIC
VEHICLE-GRID INTEGRATION**

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I. INTRODUCTION

Pursuant to Rule 2.6 of the Commission's Rules of Practice and Procedure, SDCAN hereby protests San Diego Gas & Electric Company's (SDG&E) Application for an EV pilot program costing ratepayers over \$100 million. On April 11, 2014, SDG&E filed the application and parties were directed to lodge protests no later than May 12, 2014. SDCAN is not opposing the pilot program on policy grounds, as there are undeniable benefits to better incorporating EV vehicles into the SDG&E grid. SDCAN's concerns are primarily driven by procedural concerns as well as the mismatch between costs and benefits in SDG&E's application. Further, SDCAN does not believe that this pilot program promises what it advertises; it will not result in better integration of EVs as much as it might stimulate customer adoption of EVs.

II. GROUNDS FOR PROTEST

SDG&E's application asserts the proposed pilot program is designed to examine "untapped EV benefit potential". Few would argue with that. However, the crux of the proposed pilot is summarized by SDG&E as:

".....to build, install, operate and maintain EV charging facilities under a service level agreement, to SDG&E's VGI specifications, and under SDG&E's overall supervision. The VGI Pilot Program will target charging infrastructure siting at workplace and multi-unit dwelling (MuD) host facilities, which offer around-the-clock opportunities for grid-integrated charging for potential EV customers who currently may not have convenient access to charging facilities."

SDCAN's primary concern about this application is that it is largely duplicative of a program proposed by SDG&E in A.10-12-005. In D.13-05-010 the Commission weighed the SDG&E proposal to install EV charging stations and rejected it at that time on the basis that

SDG&E has not provided evidence that the expenditures would result in an underserved market or a market failure.¹

SDG&E has come back to the Commission for a second bite at this apple. However, instead of filing this application in 2013, SDG&E has chosen to file this application some seven months before it files its next GRC application. Nowhere in its application does it explain why it cannot or has chosen not to include this proposed program in its upcoming GRC application. In light of the fact that it is a 10-year program, it is even more puzzling why it seeks to separate this matter from what has been and would normally be a GRC proposal.

Second, SDCAN is very concerned about SDG&E's substantial proposed cost for the program. SDG&E has not offered any evidence that it sought co-funding from the private market or from those companies that might benefit from this market-building initiative. In its opposition, SDCAN will present testimony describing how SDG&E should seek to leverage ratepayer funds with the private market to fund this kind of initiative.

Finally, after reviewing its testimony, SDCAN fails to see how the pilot program targets an underserved market nor how it will substantially stimulate the adoption and integration of EVs. These are facts that will need to be examined by intervenors in any scheduled hearings.

III. PROCEDURAL MATTERS

SDCAN submits that this application should be merged into SDG&E's upcoming GRC application. In the event that the CPUC chooses not to do so, SDCAN submits that evidentiary hearings will necessary to address factual issues raised in the application. SDG&E unreasonably assumes that intervenor testimony would be required to be filed in about one

¹ D. 13-05-010, p. 230-231

month from the issuance of a scoping memo. This timeline would preclude meaningful discovery by parties. It also unreasonably targets hearings to be held the following month. This schedule would make intervention in this matter effectively impossible, as most intervenors are focusing their resources on similar issues being litigated in the Residential Rate OIR.

The urgency that underlays SDG&E's proposed schedule conflicts with the exceedingly long-time frame envisioned for the pilot program. SDG&E is pushing to get the Commission to authorize within six months a program whose impact would not be felt for years, the benefit of which will largely inure sometime in 2025.

IV. EFFECT OF THE APPLICATION ON THE PROTESTANT

SDCAN is a non-profit consumer advocacy organization and its director has a long history of representing the interests of SDG&E's residential and small commercial customers before this Commission. SDCAN's articles of incorporation specifically authorize its representation of the interests of such customers. The instant application harms the interests of SDG&E's residential and small commercial ratepayers, whose interests SDCAN represents,

Respectfully submitted,

Dated: May 6, 2014

/s/

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