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

RE: Pacific Gas and Electric Company's Comments to Draft Resolution E-4651 Approving the Utilities' Schedule Plug-In Electric Vehicle Submetering Pilot Tariff with Modifications (PG&E Advice 4253-E)

Dear Energy Division Tariff Unit:

I. INTRODUCTION

Pursuant to Rule 14.3(a) of the California Public Utilities Commission (Commission or CPUC) Rules of Practice and Procedure, Pacific Gas and Electric Company (PG&E) provides its opening comments on the draft resolution modifying the requirements for the implementation of Electric Vehicle Submetering Pilot.

PG&E has several concerns with the draft resolution, which are expressed below. PG&E has collaborated with Southern California Edison Company (SCE) and San Diego Gas and Electric Company (SDG&E) closely over the course of this proceeding and supports the analysis and recommendations included in their comments to this draft resolution, which were also filed on this date.

In particular, PG&E recommends that the draft resolution to be revised or clarified as follows:

- **The Third Party Evaluator budget should remain at \$3 million, and not be reduced to \$1 million.**
- **The manner and the amount of funds to be reallocated from the Third Party Evaluator budget to the incentive budget should be clarified.**
- **If Community Choice Aggregator customers are to be eligible for Phase 1 of the pilot, a process should be provided to manage their unique circumstance.**
- **Revisions should be made to Special Condition 10 of the PEVSP tariff.**
- **The submeter VEE standards proposed by the IOUs in Phase 1 of the pilot are reasonable, but should be reexamined prior to Phase 2.**
- **Limits should be placed on the number of submeters behind a primary meter when technological barriers exist. Clarifying language should also be added prohibiting multiple levels of submetering arrangements.**

PG&E's proposed revisions and clarifications to the draft resolution are discussed in detail under the headings below.

II. The Draft Resolution Errs in its Reduction of the IOUs' Evaluation Budget

The Commission has directed that "The IOUs shall reduce the budget for the Third Party Evaluator (3PE) by \$2 Million to \$1,000,000 in aggregate across all three utilities." The Commission further states that "In particular, the customer evaluation expense seems large. In aggregate, the utilities are proposing spending \$3 million for an evaluator that will be evaluating 1,500 customers and utility expenses associated with submetering."

The draft resolution errs by assuming that the 3PE budget is only for the first phase of the pilot, or 1,500 combined customers. To be clear, in OP 3 of D.13-11-002 (Decision), the IOUs were ordered to file "a preliminary budget for the submetering pilots" and the 3PE budget submitted with the IOUs Tier 2 advice letters followed this direction. Consequently, the maximum number of customers in the two pilot phases to be evaluated is 3,000, not 1,500 customers.

The draft resolution also errs in using the Solar Water Heater (SWH) example to justify a \$2 million cut to the 3PE budget. The draft resolution indicates that the SWH pilot accommodated 342 customers over three years but fails to consider that only 38 meters were involved. The submeter pilots, having a maximum subscription of 3,000 submeters to survey, review and analyze data, is 80 times larger than the SWH program but is only given twice the budget. Also, unlike the SWH evaluation which occurred in a relatively small geographic area, the EV Submetering pilot is spread across three IOUs requiring additional time and travel expenses for the evaluator, in addition to conducting and reporting the 150 submeter field tests.

A simple litmus test to use in evaluating the proposed 3PE budget is to develop a pro-forma consulting budget for the contract. Assuming that a consultant is paid \$240/hour (including expenses), the \$1 million budget provides for only about seven tenths of an FTE for program evaluation for each year of the pilot's term, which is completely inadequate. Besides having to survey program participants, analyze that data and test 150 submeters, the 3PE will be called upon to benchmark service and technology innovations, examine technological standardization and provide suggestions for cost minimization. The breadth and depth of skills and knowledge required to perform these tasks go well beyond the services provided in the SWH pilot and will likely require the services of a multi-disciplinary consulting firm. The Decision also provides that "the third party evaluator will be responsible for determining the appropriate methodology in executing the customer experience evaluation"¹ and thus a certain amount of autonomy and planning is needed by the 3PE to create its own evaluation measures.

A more appropriate example to use is the recent CSI Metering Project which consisted of a statewide evaluation of 520 meters installed and tested over a 7 year period at of cost of \$3.6 million. PG&E believes that the proposed \$1 million budget for 3PE services is entirely unrealistic and that the budget should remain at \$3 Million. Conversely, the general scope of work, as proposed in D.13-11-025, can be dramatically reduced to fit the proposed budget but potentially compromise the scope of learnings from the pilot.

¹ Page 38 of D.13-11-025

III. If the Commission Elects to Reallocate Third Party Evaluation Funds to Increase MDMA Incentive Payments, the Amount to be Reallocated Must be Clarified

The IOUs are directed to use the \$2 Million previously allocated to the Third Party Evaluator to provide the Submeter MDMA a one-time enrollment payment of no less than \$500 per customer and a \$33 per month payment for performing submetering data management and exchange responsibilities². However, two paragraphs earlier the Commission states that “The IOUs should apply \$1.5 million of excess evaluator costs described above to increase the incentive payment. The remaining amount of excess evaluator funding should be eliminated from the budget.” These two statements seem at odds. PG&E requests clarification on how it wishes the IOUs to reallocate their budgets between 3PE costs and incentives.

IV. Community Choice Aggregator’s Participation in the EV Submetering Pilots

The Commission’s draft resolution indicates that “*the IOUs should revise Schedule PEVSP to allow participation by Community Choice Aggregator customers.*” PG&E is willing to work with the CCAs, and in particular MCE, to facilitate CCA customer participation in the EV Submetering pilot. However, the inclusion of CCA customers will require the creation of a different process than has been envisioned to date.

PG&E currently provides “Bill-Ready” Consolidated Billing services to MCE. This means that PG&E, as the MCE customer’s MDMA, is required to send the gross meter data for both the service account and submetered data to MCE. MCE in turn will need to perform a subtractive calculation to determine the customer’s usage on the primary account, calculate its’ portion of the customer’s bill for both the primary and submetered usages, and then submit their generation charges to PG&E for inclusion with the utility portion of the bill for consolidation and remittance to the customer.

Looking more closely at this process, PG&E and MCE will need to work together to enable the currently used EDI system to exchange multiple pieces of information for a single MCE customer; PG&E’s EDI system may require modification to accommodate this exchange. Also, once both the primary and submeter bill have been calculated using PG&E T&D costs and MCE generation costs, a process will need to be developed to ensure that the EV submeter line item is incorporated in the CCA’s portion of the bill, or in PG&E’s summary section of the bill, consistent with the pilot terms.

There is also a potential conflict between the PEVSP tariff and the CCA tariff which may need to be resolved prior to MCE’s participation. Specifically, the PEVSP tariff allows MDMA-S’ a 3 day window to provide submetered data to PG&E. This provision may not only potentially delay a customer’s bill, but may also be at odds with the Bill Ready Consolidated Billing requirements in PG&E’s CCA tariffs which state “*CCA charges must be received by PG&E the day following PG&E’s actual meter read date. If billing charges have not been received from the CCA by this date, PG&E may render the bill for PG&E charges only, without CCA charges.*”³ Some arrangement, either through tariff or by mutual agreement, will have to be made to accommodate this potential conflict in Rules.

The draft resolution also expresses concern that “CCAs would be unprepared to accommodate submetering, putting CCAs at a competitive disadvantage to the IOU [1],” if not included in this phase of

² Pages 26-27 of draft resolution

³ PG&E’s electric Rule 23.P.1.c (3) (c)

the pilot. This concern is misplaced because the IOUs are specifically excluded from participating in the EV submetering market - they are not a competitive threat.

Finally, PG&E recommends that the tariff language which allows CCA customers to be eligible for this pilot be qualified by the phrase, "at the discretion of the CCA." The Commission's consumer protection rules do not seem to provide CCA customers who wish to procure a 3rd party, non-CCA MDMA-S with any remedy if the CCA refuses to provide billing services for the submeter. The qualifying statement will help avoid confusion for 3rd party MDMA-S' and CCA customers alike.

V. Online Tools Will be Available to Pilot Participants but the Data Presented will not Include Submetering Data

PG&E would like to clarify the Special Condition 10 of PEVSP tariff which states:

"Pilot Eligibility: Customers participating in this Pilot will not be eligible to participate in UTILITY's Level Pay Plan (LPP), Direct Payment (DP) Option, or other programs such as {MyEnergy}, Green Button, Budget Assistant, PTR, or Rate Analyzer."

In particular, participants will still be eligible to access online features in MyEnergy and utilize PG&E web-based rate tools as before, however the customer's EV submeter data, which might inform the customer of its' full energy picture, will not be available on line during the pilot. This exclusion is consistent with Page 31 of the Decision.

PG&E recommends the following the changes:

"Pilot Eligibility: Customers participating in this Pilot will not be eligible to participate in UTILITY's Level Pay Plan (LPP), Direct Payment (DP) Option, and PTR or other programs such as {MyEnergy}, Green Button, Budget Assistant, PTR, or Rate Analyzer. Submetered data will not be available online which may impact the effectiveness of tools like MyEnergy and rate analysis programs."

VI. Further Collaboration on a Submeter Validating, Editing and Estimating (VEE) Methodology is not needed for Phase One of the Pilot

PG&E believes that it has already met the spirit and intent of the Commission's direction to collaborate with the MDMA's to develop a VEE methodology for submetered data. PG&E and the other IOUs discussed their VEE proposal with interested Submeter MDMA's on January 3, 2014. Parties on that call did not express any concerns with the IOU's proposal. These proposed VEE standards were submitted in the Advice Letter 4343-E, Attachment 1, "EV Submeter Pilot Phase 1 - PERFORMANCE STANDARDS FOR METERING AND METER DATA MANAGEMENT AGENTS." This document states that for the purposes of Phase 1 of the Commission's EV "single customer of record" submetering pilot, the IOUs will accept the Submeter MDMA's data as being "valid" or VEE'd and bill both EV and primary accounts accordingly. Specifically, it states that "the Submeter MDMA is not required to follow the "Standards for Validating, Editing, and Estimating Monthly and Interval Data for Monthly and Interval Data" contained in "VEE-Attachment of the Direct Access Standards for Metering and Meter Data." There is diminished value in VEEing submetered data for a single customer of record because the usage is allocated across two electric bills, both of which the single customer is responsible to pay. This is not the case for Phase 2 of the pilot however.

The final resolution should accept the language as it currently exists, but revisit the VEE issue in Phase 2 of the pilot.

VII. The IOUs Should Eliminate the Limit of 5 Submeters Per Primary Meter if Certain Conditions are Met

PG&E understands that the Decision does not specifically limit the amount of submeters that may be placed behind a single “primary” meter. However, PG&E’s billing system is limited to 20 subaccounts which poses a technological constraint to this policy decision. PG&E requests that it only be required to support that the 19 submeters that it is able to support in its billing system. PG&E also requests that the Commission make clear that submeter-to-submeter relationships are not permitted. Rather, multiple levels of submeters should not be allowed because it further complicates the IOU billing processes, provides opportunity for crossed-services and is not needed to test the single PEV submeter model that has been discussed to date.

PG&E recommends that the last sentence of Special Condition 11 be revised as follows in PG&E’s PEVSP tariff:

“There will be no more than ~~5~~ 19 submeters allowed for each primary meter. Multiple levels of EV submeters are not permitted.”

VIII. Conclusion

The Commission should approve the draft resolution after making the proposed changes and revisions recommended in this document along with those changes and revisions incorporated into SCE’s and SDG&E’s comments.

Sincerely,

Handwritten signature of Brian Cherry in black ink, with the initials 'KAC' written to the right of the signature.

Vice President, Regulatory Relations

cc: President Michael R. Peevey
Commissioner Michel P. Florio
Commissioner Carla J. Peterman
Commissioner Michael Picker
Commissioner Catherine J. K. Sandoval
Karen V. Clopton – Acting General Counsel
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Service Lists R.09-08-009 and R.13-11-007