

Page 1



Page 1

Page 1

Page 1

California Public Utilities Commission

Energy Division

505 Van Ness Avenue

San Francisco, CA 94102

Page 1

Re: Comments on DRA65, EV Submetering Pilot

Page 1

May 14, 2014

Page 1

Glen Canyon appreciates the work and thought the Commission Electric Vehicle Submetering Pilot. 4650 Electric Resonance parameters that will a foundation. Our reading, 100% of the pilot had not prior comments and still comes up short in a number of goals of the project. Below, please find the concerns we

1. Business interruption. The individual pilot customer will have the true financial change between the EVMA and the free investor owned IOUs. This is that business transaction to be asked to ramp up the program and staffing + procure have absolutely no assurance of payment. The pilot is not 100% funded for the efforts towards a successful

Without industry standards, it is common to see CPU and will likely get standard results as you seek the best option for Electric Vehicle submetering for this pilot project.

Page 1

2. Customer disposition. CA and the CRA believe the IOUs are able to pilot what costs they bear. Our understanding is that the IOUs are providing assurance of this pilot's success 100% under the discretion of the CPUC/ratepayers through the pilot:

Page 4

Page 5

The Commission may elect to order MDNAs to order to hide customers' MDNAs. The Commission maintains strong obligations to protect customer privacy; and (2) the costs associated with identifying MDNAs are minimal.

Page 6

We must first determine the responsibilities of MDNAs and other acquisition. Based on the Load Research Reports, the Commission including those that for one reason or another, the Commission communication participants within the stated budget. The Commission should consider cool resources, organizations, and the California PEV rebate program. We will participate in the coordinated outreach the required enrollment them the

3. Registered MDNAs. As appears, the Commission may order additional MDNAs for participation. The Commission's privacy policy should be updated when organizations have been participants since when they were asked to participate for Commission to establish clarity surrounding eligibility to participate in sharing of exclusivity rights among MDNAs. We believe the Commission may be a partner, however, are confused how this will remain

4. LCFS Credit availability for MDNAs and other participants. CPUC staff and other leading up to any proposed rulemaking for providing access during the pilot. We clearly, the pilot will for fuel by this benefit. The Commission will be a partner for ESI. By providing an alternative, we will have other opportunity to do a "right" thing. The Commission should continue to

5. Solar, EV, and EM studies. The Commission should continue to confirm EV adoption and Solar. As such, an accurate inclusion of more occurring in the California Rate Payers and the CPUC EV adoption in an exponential fashion similar to PV adoption. A proportion that matches market reality. The Commission should work with the "cost reason" solar. At NEM, the Commission would offer utilizing our revenue grade technology. The Commission of California's benefit wish to increase the sample. The Commission should proportion

Page 1

demonstrated adoption rates of EVs to achieve the best unders transportation and distributed energy generation.

Page 1

6. Technology charging level. Our pilot achieves submetering at scale with broad access to EV charging. Our pilot provides a better understanding of the EV charging market, encourages testing and submetering for EV charging, and provides the lowest cost such as our pilot. We will provide technical documents, where relevant, we will provide submetering services to our pilot meter at all levels of EV charging.

Page 1

Please consider our feedback towards achieving our results. We appreciate the opportunity to provide feedback and are looking forward to a successful pilot.

Page 1

Sincerely,

John Heibel, CEO
Glen Canyon Corporation