



BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

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Application of San Diego Gas & Electric  
Company (U902E) for Approval of SB 350  
Transportation Electrification Proposals

Application A.17-01-020  
(Filed January 20, 2017)

**RESPONSE OF CENTER FOR SUSTAINABLE ENERGY® TO THE  
APPLICATION OF SAN DIEGO GAS & ELECTRIC COMPANY (U902E)  
FOR APPROVAL OF SB 350 TRANSPORTATION ELECTRIFICATION  
PROPOSALS**

**Center for Sustainable Energy®**

**March 6, 2017**

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## I. INTRODUCTION

The Center for Sustainable Energy® (CSE) is pleased to provide this Response to the California Public Utilities Commission (Commission) regarding the *Application of San Diego Gas & Electric Company (U902E) for Approval of SB 350 Transportation Electrification Proposals*, filed with the Commission on January 20, 2017 (Application). As a mission-driven nonprofit organization, CSE is committed to accelerating the transition to a sustainable world powered by clean energy, including the diversification of transportation technologies focused on air quality improvements and greenhouse gas (GHG) emissions reductions.

CSE works with policymakers, public agencies, local governments, utilities, business and civic leaders to transform the energy marketplace and accelerate the transition to a clean energy future. Our clean energy future depends on a strong, low carbon economy that provides abundant jobs and business opportunities, a high quality of life, and a clean, healthy environment. This includes the accelerated adoption of Zero-Emission Vehicles (ZEVs) and transportation electrification (TE) technologies, renewable energy (RE), distributed generation (DG), energy efficiency (EE) and building performance (BP) technologies—all of which can work together to contribute to air quality improvements and GHG emissions reductions to meet our long term goals. CSE provides the following response:

### RESPONSE TO ALL PROGRAMS:

- *Education and Outreach (E&O) programs with statewide touchpoints will require statewide coordination.*
- *Further guidance regarding anonymous and aggregated data is warranted.*
- *Evaluate the use of a single, neutral, third party program ombudsman to facilitate TE activities.*
- *Prioritize TE investments that complement statewide transportation and infrastructure policy initiatives.*

## RESPONSE TO SDG&E'S APPLICATION:

- *Support for SDG&E's Priority Review Project*
- *Regarding SDG&E's Standard Review Project*
- *Support to leverage the existing Program Advisory Council (PAC)*
- *Quarterly, not annual, reporting will be sufficient to evaluate program and project success*
- *All proposed EVSE programs should have Vehicle-Grid Integration (VGI) functionality*
- *Set 25% disadvantaged communities (DAC) benchmarks, and tailor goals to reflect SDG&E's territory demographics*

## RESPONSE TO ALL PROGRAMS

### II. EDUCATION AND OUTREACH (E&O) PROGRAMS WITH STATEWIDE TOUCHPOINTS WILL REQUIRE STATEWIDE COORDINATION.

CSE appreciates that two of the Applications (i.e., PG&E and SDG&E) contain E&O program elements, as consumer-focused engagement is a critical tool to accelerate clean technology adoption. CSE attests that establishing E&O, such as TE advisory services, is appropriate as the utility is uniquely positioned to manage and implement these types of fleet programs for their customer base.<sup>1</sup> However, to minimize duplicative efforts, encourage resource sharing, promote economies of scale, reduce redundancies, and ensure message uniformity and alignment with statewide transportation policy objectives, the Commission should direct coordination between certain, already-existing E&O programs, including:

- **ZEV Consumer E&O.** The Applications should coordinate with and support existing consumer education efforts, such as the Clean Vehicle Rebate Project (CVRP) E&O and the Plug-In Electric Vehicle Collaborative's BestRideEver campaign, rather than create additional E&O under separate branding. CSE provided this same request in

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<sup>1</sup> Response of the Center for Sustainable Energy to the Application of Southern California Edison Company (U 338-E) for Approval of its Charge Ready and Market Education Programs; December 5, 2014, pages 5-6.

reviewing the original EV Applications, in support of SCE's<sup>2</sup> and PG&E's<sup>3</sup> proposals, and continues to encourage this coordination in order to ensure uniform campaign messaging to the ZEV customer. CSE highly recommends that any ride-and-drive activities undertaken through these programs should be coordinated with CVRP and other statewide (e.g., ARB's Enhanced Fleet Modernization Program) and regional (e.g., San Joaquin Valley Air Pollution Control District's DriveClean rebate) consumer incentive projects.

- **ZEV Car Dealership E&O.** All three utilities recognize the opportunity to market, engage, and educate at car dealerships.<sup>4</sup> CSE supports this dealer-facing approach and strongly suggests that these efforts operate in concert with CSE's CVRP statewide dealership outreach activities or other existing regional dealer education efforts.

### **III. FURTHER GUIDANCE REGARDING ANONYMIZED AND AGGREGATED DATA IS WARRANTED.**

CSE appreciates that each utility plans to collect data and that SCE's<sup>5</sup> and SDG&E's<sup>6</sup> portfolios will be geared to provide "anonymous and aggregated data" for evaluation. CSE is especially supportive of SDG&E's focus on testing and measuring the flexibility of EV charging loads,<sup>7</sup> and its goal to study charging behavior at long-duration public locations.<sup>8</sup>

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<sup>2</sup> CSE Response, A.14-10-014, December 5, 2014, page 8-9.

<sup>3</sup> Response of the Center for Sustainable Energy to Pacific Gas and Electric Company's (U 39 E) Electric Vehicle Infrastructure and Education Program Application, March 11, 2015, page 9.

<sup>4</sup> PG&E proposes that it may market at local car dealerships; SCE may also engage with EV dealers to promote the pilot at the point of sale; SDG&E proposes to offer EV education and incentives to dealerships and their salespeople to increase EV sales and enhance the associated customer experience.

<sup>5</sup> Application of Southern California Edison Company for Approval of its 2017 Transportation Electrification Proposals, January 20, 2017, page 92.

<sup>6</sup> Application of San Diego Gas & Electric Company (U902E) for Approval of SB 350 Transportation Electrification Proposals; January 20, 2017, page LB-39.

<sup>7</sup> Application of San Diego Gas & Electric Company (U902E) for Approval of SB 350 Transportation Electrification Proposals at 2, states that goals include to "[p]rovide data that will help test and measure the flexibility of EV charging loads and the degree to which the efficient integration of

While these actions generally appear adequate to achieve the Commission's direction regarding measurable monitoring and evaluation criteria,<sup>9</sup> CSE attests to the value and opportunity of a more robust data collection methodology, in which the Commission should consider:

- ***Development of a robust data collection plan.*** CSE recommends the creation of a data collection methodology to ensure uniform reporting across all projects and territories, which will maximize the learning from these investments. Data should be made publicly available, easily shared and accessible, and distributed as openly and widely as possible (while ensuring confidentiality and privacy where needed). Public-facing information provides key feedback on program success, informs policy decision-making processes, and is the basis for program evaluation and research, market characterization and strategic decision-making. Robust, transparent data collection methodologies and sources will inevitably strengthen the long-term design of the TE Programs. With this in mind, the Commission should require:
  - ***Uniform Data.*** Data requirements should be consistent and apply across all selected TE projects and programs. Uniformity supports data collection efficiencies, ensures the program metrics and evaluations are comparable, and promotes quality assurance and control of the data. CSE strongly encourages the Commission to provide guidance on the data sources it plans to hold consistent across all TE programs.
  - ***Data with a defined purpose.*** These programs provide the opportunity for pilots and experiments in a select market segment to accumulate experience that can

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EV loads can yield cost savings to all customers by avoiding future utility infrastructure additions".

<sup>8</sup> *Application of San Diego Gas & Electric Company (U902E) for Approval of SB 350 Transportation Electrification Proposals* at LB-3.

<sup>9</sup> *Assigned Commissioner's Ruling Regarding the Filing of the Transportation Electrification Applications Pursuant to Senate Bill 350*, pages 14 and A1.

inform the scale and design of future projects and targets. As such, collection of program data must enable researchers to assess the effectiveness of these programs, individually and collectively, across a broad set of metrics. Data collection should be oriented to address specific questions, such as cost-effectiveness, diffusion rates, low-income participation, technology/system performance, durability, and other qualitative and quantitative measures. While CSE recognizes that each proposal contains data with some these touchpoints, there will be added value by working across programs to share and communicate learnings from experiences.

- ***Streamlined Data Reporting.*** Data reporting requirements should be based on program requirements and should be easy for programs to track and easy for evaluators to understand. These efforts in turn reduce administrative costs and support the collection (and distribution) of good data.
- ***Deeply Granular Data.*** Data should be reported in the lowest census designation necessary to anonymize data. Reporting data in census designations makes it easier for researchers to associate program data with public data sources and aligns the data with the CalEnviroScreen Tool. Using such a threshold balances the need for data privacy, while reducing loss of information needed by researchers. This data approach will help support the goal to replicate and scale successful projects and initiatives.
- ***Geographical Data:*** The Commission should direct the use of a geographical information system (GIS) tool to track the locations of infrastructure installations, consistent with requirements adopted in the original EV infrastructure pilots. Installation data should also be integrated into existing infrastructure datasets, such

as the Department of Energy's Alternative Fueling Station Locator<sup>10</sup> and should be compatible with the California Climate Investments Map.<sup>11</sup>

- ***Categorical Data.*** Data reporting requirements should support measurement not only of basic program information, but also of other priorities, such as GHG emissions reductions and access to financial and health benefits of sustainable energy programs. Data standards should also enable improved market segmentation analyses.
- ***Easily Disseminated Data.*** The Commission should publish data via an easily-accessible online portal and provide the data in easily usable formats (such as Excel, Access) and standards GIS formats (such as Keyhole Markup Language/KMZ, ArcGIS shape files, etc.). This data should be updated often, either weekly or biweekly, to expeditiously inform stakeholders of program activity.

This type and level of public-facing information provides key feedback on program success, informs policy decision-making processes, serves as the basis for program evaluation and research, educates market characterization and strategic decision-making, and informs potential replication. Robust, transparent data collection methodologies and sources will inevitably strengthen all of the TE investments over the long-term, as well as inform program iterations. As such, CSE strongly encourages the Commission to direct the utilities to gather information consistent with these seven proposed tenets. Moreover, CSE encourages the Commission to prioritize the “anonymous and aggregated data” discussion as a priority topic

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<sup>10</sup> Department of Energy's Alternative Fueling Station Locator, Website Access: <http://www.afdc.energy.gov/locator/stations/>

<sup>11</sup> California Climate Investments Map; Website Access: <http://www.climateinvestmentmap.ca.gov/>



in the PACs, which would be consistent with Commission direction to the PACs regarding data advisory on all three previously approved EV applications.<sup>12</sup>

#### **IV. EVALUATE THE USE OF A SINGLE, NEUTRAL, THIRD PARTY PROGRAM OMBUDSMAN TO FACILITATE TE ACTIVITIES.**

CSE applauds the program diversity across the Applications. There are currently a total of 21 pilots and programs before the Commission, and 4 rate design proposals. Moreover, smaller electrical corporations will file TE applications by June 30, 2017, which will enlarge this program pool. This vast group of pilots and programs offers California a unique opportunity to learn from the significant rate-payer investment in TE. To maximize the potential impact of the investment, a concerted and expanded effort to harmonize the learnings with the directives of SB 350, the ZEV Action Plan, and other transportation policies, is recommended.

Without this recommended coordination role, CSE is concerned that the lack of uniformity in data collection and informational management across programs may make cross-comparing program activities and general data sharing challenging. This lack of uniformity may lead to “siloed” and disjointed program assessment approaches, which may ultimately lead to uncaptured data and information, resulting in California potentially losing a critical opportunity to learn from the pilots and programs. As such, CSE recommends that the Commission evaluate the use of a single, third-party, statewide ombudsman, to serve as an independent aggregator of program data, information, and lessons learned across all six utility transportation electrification applications and their respective programs. The Ombudsman would work with the utilities, the Commission, and other relevant state agencies (e.g., Governor’s Office of Planning and Research, Governor’s Office of Business and Economic Development) to provide brand-neutral, unbiased support in areas such as:

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<sup>12</sup> D.16-12-065, December 15, 2016, page 70; D.16-01-045, January 28, 2016, page 15; D.16-01-023, January 14, 2016, page 36.



- **Stakeholder Coordination.** The ombudsman could coordinate its activity with advisory committees and other stakeholders and serve as one of the liaisons between advisory committees, the utilities, the Commission, state agencies involved with executing the ZEV Action Plan, and other complementary and or/related programs, including the newly established California Energy Commission Block Grant for EV Chargers program.
- **Data and Information Aggregation.** The ombudsman could collect and aggregate data and information of various program activities. Through online, open-access portals and data dashboards, the ombudsman could manage a centralized and publicly-facing website designed to encourage information and data sharing.
- **Research and Information Sharing.** The ombudsman could facilitate discussions and activities (such as workshops and focus groups) that target stakeholder education and engagement to encourage information and idea-sharing. Topics of discussion could include emergent TE research and policy initiatives. This effort may spawn independent research and data analysis that informs the policy decision making processes related to TE, which would strengthen the TE ecosystem.

Broadly, the use of an ombudsman would strengthen the pursuit of the Commission's SB 350 TE Application Guidance by supporting all programs' trackable performance and accountability measures and continuing cost-effective support and alignment of statewide TE policy and investment.

## **V. PRIORITIZE TE INVESTMENTS THAT COMPLEMENT STATEWIDE TRANSPORTATION AND INFRASTRUCTURE POLICY INITIATIVES.**

The utilities have presented a series of programs that satisfy Commission direction<sup>13</sup> and current policy setting. Nonetheless, these programs would be strengthened by additional

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<sup>13</sup> *Assigned Commissioner's Ruling Regarding the Filing of the Transportation Electrification Applications Pursuant to Senate Bill 350, September 14, 2016.*

connectivity to statewide transportation and infrastructure initiatives, including, and not limited to, the following:

- **The California Energy Commission Block Grant for EV Chargers Program.** To encourage funding and partnership collaboration, the Commission should direct the utilities to prioritize ongoing coordination with the recently-approved Block Grant for EV Chargers Program initiative. This program will deploy \$200 million in grant funds through various EV charger incentive projects across California during the next five years. The Block Grant program investment has a high propensity to act as an accelerant for the deployment of EVSE and will likely provide opportunities for coordination with these TE programs. In addition, the EV Charger Block Grant Program will record EVSE geographical and locational characteristics, which will support data and research, as well as monitoring and evaluation activities that complement these TE programs. As such, CSE encourages the Commission to direct utility coordination with this emergent program.
- **The Transformative Climate Communities (TCC) Program.** No TE applications mention the TCC Program, yet the TCC Program scoping guidelines prioritize public transit and zero and near-zero emission transportation<sup>14</sup> and discuss the use of smart-grid technologies and energy storage,<sup>15</sup> which complement the innovative approaches of these applications. The TCC program also targets air pollution and GHG emissions reductions and presents the opportunity to showcase targeted programs that support the State's most disadvantaged, and low-and moderate-income households.<sup>16</sup> This suggests well-aligned opportunities for collaboration. In addition, per AB 2722<sup>17</sup> and

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<sup>14</sup> *Transformative Climate Communities Draft Scoping Guidelines*, page 6. Website Access: <http://sgc.ca.gov/resource%20files/20161123-TCCDraftScopingGuidelines.pdf>

<sup>15</sup> *Id.* at 6.

<sup>16</sup> As referenced in policies, including AB 197, SB 1204, SB 1275, SB 535, and AB 1550.

<sup>17</sup> Website Access:

[https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill\\_id=201520160AB2722](https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=201520160AB2722)

the State Budget Act of 2016,<sup>18</sup> this program has an established policy framework and an available \$140 million allocated across three target areas.

- Mass Transit/TE Passenger Rail Investments.** Commission direction identifies rail as a potential TE program investment,<sup>19</sup> yet no application plainly develops rail-targeted TE programs. In alignment with current policy, the 2016 ZEV Action Plan prioritizes zero-emission technologies for public transit and freight transport.<sup>20</sup> The State has shovel-ready projects, such as the Caltrain Modernization Program, which will convert Caltrain's less efficient, diesel miles into 88,000,000 kWh of electricity for propulsion in 2020,<sup>21</sup> which will lead to substantial emissions improvement in the corridor. The electricity to propel electrified rail can be supplied by innovative clean distributed and renewable energy technology investments, such as solar PV and wayside energy storage.<sup>22</sup> There are also synergistic opportunities to share resources between projects, which complements Commission direction to "alleviate some of the financial burden on ratepayers."<sup>23</sup> In addition, investments in passenger rail induce mode shift and maintain high participation rates by providing low barriers to access while providing very high capacity on a passenger per mile basis, which complement the Commission's

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<sup>18</sup> AB-1613 Budget Act of 2016; Website Access:

[https://leginfo.ca.gov/faces/billTextClient.xhtml?bill\\_id=201520160AB1613](https://leginfo.ca.gov/faces/billTextClient.xhtml?bill_id=201520160AB1613)

<sup>19</sup> *Assigned Commissioner's Ruling Regarding the Filing of the Transportation Electrification Applications Pursuant to Senate Bill 350.*

<sup>20</sup> 2016 ZEV Action Plan; Website Access:

[https://www.gov.ca.gov/docs/2016\\_ZEV\\_Action\\_Plan.pdf](https://www.gov.ca.gov/docs/2016_ZEV_Action_Plan.pdf)

<sup>21</sup> *Peninsula Corridor Electrification Project EIR; Volume I- Revised DEIR*; December 2014; page ES-11; Website Access:

[http://www.caltrain.com/projectsplans/CaltrainModernization/Modernization/PeninsulaCorridorElectrificationProject/PCEP\\_FEIR\\_2014.html](http://www.caltrain.com/projectsplans/CaltrainModernization/Modernization/PeninsulaCorridorElectrificationProject/PCEP_FEIR_2014.html)

<sup>22</sup> Los Angeles Metro uses Wayside Energy Storage systems, which has resulted in the research, development, production, and installation of systems that use flywheel technology to recycle power generated from rail cars; Website Access: <https://www.calnetix.com/newsroom/press-release/vycon-technology-allows-los-angeles-metro-be-first-transit-agency-us-using>

<sup>23</sup> *Assigned Commissioner's Ruling Regarding the Filing of the Transportation Electrification Applications Pursuant to Senate Bill 350*, page 27.

policy to maximize benefits and support “improvement of the energy efficiency of travel” in the interests of ratepayers.<sup>24</sup>

From CSE’s perspective, prioritizing collaboration in these areas will encourage innovative techniques, promote best practices and resource sharing, and enhance information and idea sharing.

## RESPONSE TO SDG&E’S APPLICATION

### VI. SUPPORT FOR SDG&E’S PRIORITY REVIEW PROJECTS

CSE supports SDG&E’s airport ground service equipment (GSE), Park-and-Ride, port, delivery fleet, taxi/shuttle, and dealer programs. These projects fit within the provisions set by the Commission to “consider innovative program designs”.<sup>25</sup> CSE observes that the airport GSE, delivery fleet, and port vehicles/forklifts programs are unique programs operating essentially as load studies that could support future VGI projects. CSE provides additional comments on four programs:

- **Electrify Local Highways:** CSE appreciates that SDG&E proposes collaboration with Caltrans, which complements the Commission’s direction to “align with Local, Regional, and State TE Efforts”<sup>26</sup> and may provide a scalable and replicable model for statewide activities. While CSE understands that this program presents locations that are adjacent to disadvantaged communities (DACs), there may be additional paths to develop project elements specifically tailored to promote DAC resident use of the Park-and-Ride infrastructure. This could take the form of tailored E&O or other marketing strategies.

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<sup>24</sup> Pub. Util. Code § 740.8

<sup>25</sup> *Assigned Commissioner’s Ruling Regarding the Filing of the Transportation Electrification Applications Pursuant to Senate Bill 350*, page 19.

<sup>26</sup> *Id.* at 25.

- **MD/HD and Forklift Port Electrification:** CSE supports this program as it has the potential to provide anonymous and aggregated data for evaluation that will align well with the California Sustainable Freight Action Plan.
- **Fleet Delivery Services:** CSE supports this program but would like to see a strengthened plan around SDG&E's target group, location, and strategy for the proposed "set aside funds".<sup>27</sup>
- **Taxi/Shuttle/Rideshare:** CSE supports this innovative program approach. However, it is not clear from SDG&E's proposal if it proposes to scale the taxi incentive beyond the initial pilot and to utilize the same volumetric incentive reduction practice of the original airport taxi program, which contained "step down" provisions. This will be especially important in the case that SDG&E scales this pilot. CSE also encourages SDG&E to engage the San Diego taxi driver union early to help develop a program that will best serve them. In addition, it is notable that SDG&E's program does not mention autonomous vehicles or future mobility services, which may be a part of the emergent taxi/shuttle landscape and ecosystem.
- **Dealership Incentives:** CSE supports SDG&E's innovative dealership incentive approach, as we have previously. Providing rebates in this manner will encourage expanded PEV adoption, and the proposed dealer incentive project goal of educating and encouraging drivers on the benefits of signing up for an EV-time of use (EV-TOU) rate can encourage charging during times that cause minimal impact to the grid. CSE can attest to the successes of providing PEV dealership and sales people direct incentives. Through the Connecticut Hydrogen and Electric Automobile Purchase Rebate (CHEAPR) program, which CSE administers, dealerships receive a \$300

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<sup>27</sup> *Application of San Diego Gas & Electric Company (U 902-E) for Authority to Implement Priority Review and Standard Review Proposals to Accelerate Widespread Transportation Electrification*, page RS-55.

incentive for each eligible PEV sold or leased. Early evaluation of the program shows that this incentive motivates sales staff to spend more time learning about EVs, to spend more time with a customer to teach them about EV ownership and use, and to try to convert customers interested in conventional vehicles to EVs, among other things.<sup>28</sup> While CSE supports SDG&E's dealership incentive approach, CSE encourages the Commission to direct an open, iterative process to evaluate and determine the ideal dealership program design and rebate amount for the incentive project. In this regard, CSE urges the Commission to consider leveraging the Program Advisory Council (PAC) to provide feedback and guidance to SDG&E on these matters.

## **VII. REGARDING SDG&E'S STANDARD REVIEW PROJECT**

CSE supports significant investment in residential charging in SDG&E's territory, the underlying concept of SDG&E's standard review project proposal. In addition to the proposed Level 2 charging for single-family homes, CSE recommends that the Commission direct SDG&E to include multi-unit dwelling (MUD) investments and make Level 1 charging an option in the program.

CSE is supportive of utility ownership of Level 2 charging in single-family homes located in DACs and MUDs throughout the territory, where access to charging remains a significant barrier to PEV adoption. For residential charging in other locations, CSE recommends that alternatives to utility ownership also be explored, including:

- Equipment rebates;
- Installation rebates/funding (i.e., for "make-ready infrastructure"); and
- Development of a consumer-focused EVSE installer/contractor portal (similar to the Home Charger Information Resource Pilot proposed by PG&E).

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<sup>28</sup> Center for Sustainable Energy (2016). *Evaluating the Connecticut Dealer Incentive for Electric Vehicle Sales*. Web Access: [http://energycenter.org/sites/default/files/docs/nav/resources/2016-10-25\\_Connecticut\\_Dealer\\_Incentive\\_EV.pdf](http://energycenter.org/sites/default/files/docs/nav/resources/2016-10-25_Connecticut_Dealer_Incentive_EV.pdf)



Regarding rates and metering, CSE supports rate *choice* and recommends further analysis of rate impacts. SDG&E's proposed requirement that consumers adopt whole-house grid-integrated rates may be costly for some consumers and confusing for most. Consideration should also be given to an EV sub-metering option. This would complement parallel sub-metering pilot activities underway by the Commission.

### **VIII. SUPPORT TO LEVERAGE THE EXISTING PROGRAM ADVISORY COUNCIL (PAC)**

CSE appreciates that SDG&E proposes to leverage the existing PAC.<sup>29</sup> To streamline uniform communications to a diverse array of stakeholders, while minimizing duplicative processes and resource allocation, using the existing PAC is suitable. Nonetheless, there will be a need to expand stakeholder participation and update policy to reflect the new SB 350 TE framework. As such, CSE encourages the Commission to consider advising the PAC to hold an open recruitment for additional TE stakeholders and advise the PAC to discuss subjects, including and not limited to: (a) dealership incentive program design; (b) DAC benchmarks; (c) data collection methodology, gathering timelines, and access; (d) successful program implementation procedures; and (e) TE stakeholder composition. In addition, to encourage iterative processes and program transparency and stakeholder feedback, the Commission should direct SDG&E to proceed with quarterly updates to the PAC.

### **IX. QUARTERLY, NOT ANNUAL AND SEMI-ANNUAL, REPORTING WILL BE SUFFICIENT.**

CSE is concerned with SDG&E's proposed data collection intervals, which will be reported after one year of duration,<sup>30</sup> with key metrics demonstrating program success (e.g., annual growth in ZEV by type and annual program growth) proposed to have semi-annual

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<sup>29</sup> *Application of San Diego Gas & Electric Company (U902E) for Approval of SB 350 Transportation Electrification Proposals*, page LB-40.

<sup>30</sup> *Application of San Diego Gas & Electric Company (U902E) for Approval of SB 350 Transportation Electrification Proposals*; SDG&E states: "data collection efforts will be reported after one year of duration"; page LB-39.



reporting intervals to the PACs.<sup>31</sup> These intervals seem inconsistent with the need to expeditiously evaluate program success. CSE attests that, in order to rapidly learn from program activities while soliciting effective feedback from the PAC, quarterly reporting will be warranted. Accordingly, CSE recommends that the Commission direct SDG&E to make all reporting, at maximum, on a quarterly interval. This provision should also be applied across all programs.

**X. ALL PROPOSED EVSE PROGRAMS SHOULD HAVE VEHICLE-GRID INTEGRATION (VGI) FUNCTIONALITY.**

CSE appreciates SDG&E's goal to install grid-integrated public charging at Park-and-Ride locations<sup>32</sup> as well as the proposed grid integrated rate and Fleet Delivery Services programs.<sup>33</sup> CSE also agrees that "rates are a powerful tool to help efficiently integrate the increased load of vehicle charging and renewable energy resources with the grid."<sup>34</sup> Regarding VGI Standards, CSE agrees that there is a need to assemble the VGI Communication Standard technical working group to evaluate whether or not ISO/IEC 15118 is appropriate.<sup>35</sup>

CSE reiterates its position that the Commission should evaluate the proposed TE programs based on, but not limited to, the program's ability to:

- React to dynamic pricing to encourage charging during optimal periods for the grid (thus reducing consumer costs);
- Allow for power level variation;
- Be easy-to-use by consumers and not pose unreasonable burden on the consumer when selecting when to charge;
- Protect proprietary consumer, utility and OEM information; and

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<sup>31</sup> *Id.* at RS-21.

<sup>32</sup> *Id.* at RS-17.

<sup>33</sup> *Id.* at 6-7.

<sup>34</sup> *Id.* at LB-13.

<sup>35</sup> *Id.* at LB-37 and 38.

- Allow for communication and aggregation in the wholesale market.<sup>36</sup>

Building infrastructure with VGI capability will likely prove to be an effective tactic to avoid future costs and/or negative impacts to ratepayers caused by potential stranded assets or investments that require retrofitting. As such, CSE encourages the Commission to direct SDG&E to prioritize programs that deploy VGI compatible infrastructure.

**XI. SET 25% DISADVANTAGED COMMUNITIES (DAC) BENCHMARKS, AND TAILOR GOALS TO REFLECT SDG&E'S TERRITORY DEMOGRAPHICS.**

CSE supports SDG&E's 20% installation "set aside" for DACs<sup>37</sup> and finds this threshold adequate. However, CSE attests that a 25% DAC benchmark may better align with the existing AB 1550 policy framework.<sup>38</sup> In addition, the Commission should consider defining the eligible DACs as the top quartile of census tracts per the CalEnviroScreen on either a statewide or a utility-wide basis – whichever is broader. This would be consistent with the discretion provided to SDG&E regarding the Electric Vehicle-Grid Integration Pilot Program<sup>39</sup> and SCE's Charge Ready Program.<sup>40</sup> In addition, to avoid confusion and delay, the Commission should expeditiously provide clear direction on the version of CalEnviroScreen that the utilities are to use to define DACs [i.e., CalEnviroScreen 2.0 versus 3.0 (released January 30, 2017)<sup>41</sup>].

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<sup>36</sup> *Opening Comments of the Center for Sustainable Energy to the Amended Scoping Memo and Ruling of the Assigned Commissioner and Administrative Law Judge*, May 18, 2016, page 4.

<sup>37</sup> See direct testimony of Randy Schimka (chapter 4) for further discussion on the residential charging program and DACs.

<sup>38</sup> AB 1550 requires that 25% of the Greenhouse Gas Reduction Fund (GGRF) be spent on projects located within disadvantaged communities (DACs) and requires that an additional 5% be spent on projects that benefit low-income households. Website Access: [https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill\\_id=201520160AB1550](https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=201520160AB1550)

<sup>39</sup> D.16-01-045; January 28, 2016; page 138.

<sup>40</sup> D.16-01-023; January 14, 2016; page 41.

## **XII. CONCLUSION**

CSE appreciates the opportunity to provide this response to SDG&E's Application. CSE strongly supports the Commission's SB 350 rulemaking initiatives and appreciates the Commission's leadership. Efforts such as these strongly align with the Governor's Executive Order B-16-12, the State's 50/50/50 goals as codified in SB 350, the ZEV Action Plan, and SB 1275.

Respectfully Submitted,

March 6, 2017

A handwritten signature in black ink, appearing to read "Sachu Constantine", with a stylized, flowing script.

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