

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



FILED

11-12-10
04:59 PM

Order Instituting Rulemaking on the Commission's own motion to consider alternative-fueled vehicle tariffs, infrastructure and policies to support California's greenhouse gas emissions reduction goals.

Rulemaking 09-08-009

(Filed August 20, 2009)

**RESPONSES OF THE GREENLINING INSTITUTE TO ADMINISTRATIVE LAW
JUDGE'S RULING REQUESTING MORE INFORMATION**

SAMUEL S. KANG
STEPHANIE C. CHEN
ENRIQUE GALLARDO
The Greenlining Institute
1918 University Avenue, Second Floor
Berkeley, CA 94704
Telephone: 510 926 4017
Facsimile: 510 926 4010
E-mail: enriqueg@greenlining.org

November 12, 2010

RESPONSES OF THE GREENLINING INSTITUTE TO ADMINISTRATIVE LAW JUDGE’S RULING REQUESTING MORE INFORMATION

The Greenlining Institute (“Greenlining”) provides comments in response to the Administrative Law Judge’s Ruling Requesting Additional Information (“ALJ Ruling”). Greenlining does not address all of the questions in the ALJ Ruling.

Separate Meter Costs.

Question (a): For PEV customers that choose to use a separate meter, who should bear the cost of the separate meter and why?

Greenlining recommends that plug-in electric vehicles (PEV) users, not general ratepayers, should bear the cost of separate meter arrangements. In earlier comments regarding the utility role in supporting PEV, Greenlining recommended that early adopters of PEVs should establish the market for these vehicles, and the necessary customer-specific infrastructure, before utility ratepayers invest excessively for the development of infrastructure to support PEVs.

The use of a separate meter will provide specific benefits to PEV users in that they will be able to take advantage of specialized rates. As PEV users will specifically gain these benefits through a separate meter, they should bear the cost of the meter. General ratepayers, including low-income and moderate-income ratepayers who are unlikely to be able to afford the costs of acquiring a PEV, should not bear this cost.

Question (b): How should a separate meter be financed (on-bill financing, meter charges, upfront charges, etc.) and why?

Greenlining recommends that PEV users have the option of on-bill financing of separate meters. Although, the actual costs of metering and customer-specific infrastructure should be borne by PEV users, it is appropriate for the utility to play a role to facilitate PEV adoption. As

we recognized in earlier comments, PEV use provides societal benefits in the form of greenhouse gas and pollution reduction, so that utility encouragement of PEV adoption – that does not entail added burden to ratepayers – should be provided. Separate meters may allow the utility and PEV users to design rate schedules that provide the most system benefits. Thus, this is another reason to facilitate their adoption

Utility Customer Education and Outreach

Question (a): What specific changes, if any, should the Commission consider to the proposed language above?

Greenlining supports the first guiding principle¹ for customer education and outreach. However, Greenlining does not support the second guiding principle,² as it may be too restrictive on utilities' customer education and outreach. Imposition of a requirement of “neutrality” and prohibiting any showing of “preference” to particular rate options, metering arrangements and charging levels may place barriers on a utility properly integrating its PEV programs into wider Smart Grid and dynamic pricing goals.

Greenlining recommends that a utility should have more flexibility to guide PEV users to rate options, metering arrangements or charging levels that provide system-wide and societal benefits. ~~Instead, a utility should be able to inform PEV users that a particular rate option, metering arrangement or charging level will achieve system-wide benefits.~~ However, the utility should not be able to demonstrate any preference for any particular provider of service. ~~Utility education and outreach should be able to objectively inform customers that certain PEV options~~

¹ “The utility role with respect to PEV customer education and outreach is to facilitate customer awareness of tariff options, technology options, billing options, installation options, and load management options.”

² “Utility customer education and outreach efforts should present information neutrally that gives no preference to a particular rate option and related metering arrangement, charging level or technology, installation provider, and other aspects related to customer installation of customer premise electric vehicle supply equipment.”

~~provide system-wide benefits, without demonstrating any preference for any particular providers of PEV services.~~

The first guiding principle does not lead to the second guiding principle. The first guiding principle is to “facilitate customer awareness. “Customer awareness” of different options should not proscribe awareness of the motives behind different rate options or the system impacts of different charging technologies.

Greenlining recommends that the second guiding principle be changed to establish neutrality regarding providers. Thus the principle could read:

Utility customer education and outreach efforts should present information neutrally that gives no preference to a particular provider of PEV services.

Respectfully submitted,

Dated: November 12, 2010

/s/ Enrique Gallardo
Enrique Gallardo
Staff Attorney
The Greenlining Institute

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

Order Instituting Rulemaking on the Commission's own motion to consider alternative-fueled vehicle tariffs, infrastructure and policies to support California's greenhouse gas emissions reduction goals.

Rulemaking 09-08-009
(Filed August 20, 2009)

CERTIFICATE OF SERVICE

I, Enrique Gallardo, am 18 years of age or older and a non-party to the within proceeding.

I hereby certify that I have this day served a copy of

**RESPONSES OF THE GREENLINING INSTITUTE TO ADMINISTRATIVE LAW
JUDGE'S RULING REQUESTING MORE INFORMATION**

on all known parties to Rulemaking 09-08-009 by transmitting an e-mail message with the document attached to each party named in the official service list and by faxing or mailing a properly addressed copy by first-class mail with postage prepaid to those whose e-mail address is not available.

I certify that the foregoing is true and correct.

Executed in Berkeley, California on November 12, 2010.

/s/ Enrique Gallardo
Enrique Gallardo

SERVICE LIST FOR R.09-08-009

fdms@electradrive.net
andrew.mcallister@energycenter.org
Bob@EV-ChargeAmerica.com
kwalsh@fiskerautomotive.com
pierojd@udel.edu
angie_doan@plugsmart.net
kevin.webber@tema.toyota.com
cread@ecotality.com
syndi.driscoll@ladwp.com
SDPatrick@SempraUtilities.com
npedersen@hanmor.com
david.patterson@na.mitsubishi-motors.com
helsel@avinc.com
Janet.Combs@sce.com
liddell@energyattorney.com
ek@a-klaw.com
rpople@teslamotors.com
lms@cpuc.ca.gov
Yulee@theCCT.org
nsuetake@turn.org
jay@pluginamerica.org
ssmyers@att.net
cjh5@pge.com
Ann.Bordetsky@betterplace.com
Jason.Wolf@betterplace.com
epetrill@epri.com
blake@consumercal.org
jody_london_consulting@earthlink.net
jwiedman@keyesandfox.com
jharris@volkerlaw.com
svolker@volkerlaw.com
gmorris@emf.net
enriqueg@greenlining.org
richard.lowenthal@coulombtech.com
bchang@svlg.org
shears@ceert.org
toconnor@edf.org
wwester@smud.org
aconway@dmv.ca.gov
Bob@EV-ChargeAmerica.com
cassandra.sweet@dowjones.com
david@dwassociates.us
WoychikEC@bv.com
kleacock@dmcgreen.com
krose@dmv.ca.gov
mlaherty@cisco.com
mschreim@core.com
roberto.bocca@weforum.org
ttutt@smud.org
mrw@mrwassoc.com
brian_tinkler@ahm.honda.com
EGrizard@deweysquare.com
hugh.mcdermott@betterplace.com
mike.ferry@energycenter.org
sephra.ninow@energycenter.org
tam@communityrenewables.biz
than.aung@ladwp.com
GO'neill@energy.state.ca.us
colleenquin@gmail.com
mpieniasek@drenergyconsulting.com
wchen@ecsgrid.com
kldavis@midamerican.com
AYergin@gridpoint.com
martin.liptrot@ge.com
jung.zoltan@epa.gov
jviera@ford.com
mkarwa@leviton.com
hillary.dayton@fluor.com
cbrooks@tendriline.com
Douglas.Marx@PacifiCorp.com
kmorrow@etecevs.com
AChavez@ecotality.com
Adrene.Briones@ladwp.com
Leila.Barker@ladwp.com
Marcelo.DiPaolo@ladwp.com
Oscar.Alvarez@ladwp.com
Oscar.Herrera2@ladwp.com
Priscila.Castillo@ladwp.com
Scott.Briasco@ladwp.com
Vaughn.Minassian@ladwp.com
david.eaglefan@gmail.com
leilani.johnson@ladwp.com
jellman@winnr.com
lmitchell@hanmor.com
tatsuaki.yokoyama@tema.toyota.com
bock@avinc.com
dickinson@avin.com
roche@avinc.com
klynch@cityofpasadena.net
ckuennen@ci.glendale.us
dave.barthmuss@gm.com
mbaumhefner@nrdc.org
ffletcher@ci.burbank.ca.us
flangit@ci.azusa.ca.us
andrea.moreno@sce.com
case.admin@sce.com

Case.Admin@sce.com
sfr@sandag.org
mpsweeney@earthlink.net
julian.durand@qualcomm.com
vsmith@qualcomm.com
DNiehaus@SempraUtilities.com
david.almeida@energycenter.org
RGiles@SempraUtilities.com
sbadgett@riversideca.gov
vic@theprossergroup.com
jlehman@anaheim.net
coutwater@libertyplugins.com
forest.williams@mindspring.com
chappella@co.monterey.ca.us
trae@kpcb.com
lburrows@vpvp.com
diarmuid@teslamotors.com
mdjoseph@adamsbroadwell.com
edwin.lee@sfgov.com
johanna.partin@sfgov.com
eric@ethree.com
smui@nrdc.org
bfinkelstein@turn.org
BWT4@pge.com
ELL5@pge.com
filings@a-klaw.com
tjl@a-klaw.com
bcragg@goodinmacbride.com
mgo@goodinmacbride.com
mmattes@nossaman.com
robertgex@dwt.com
Diane.Fellman@nrgenergy.com
cem@newsdata.com
axtw@pge.com
regrelcpuccases@pge.com
l1hg@pge.com
SAZ1@pge.com
sfr2@pge.com
aaron.singer@bmw.com
saluja@capricornllc.com
a.vogel@sap.com
Sven.Thesen@betterplace.com
xingxin.liu@sap.com
Sean.Beatty@mirant.com
dietrichlaw2@earthlink.net
michael.schmitz@iclei.org
Karin.Corfee@kema.com
kfox@keyesandfox.com
jhall@calstart.org

slsarris@greenfuseenergy.com
mnelson@mccarthyllaw.com
dgrandy@caonsitegen.com
jamie@jknappcommunications.com
jme@pge.com
bdicapo@caiso.com
e-recipient@caiso.com
cchilder@arb.ca.gov
ekeddie@arb.ca.gov
marcreheis@wspa.org
dmodisette@cmua.org
gina@wspa.org
jluckhardt@downeybrand.com
Julee@ppallc.com
Ralph.Moran@bp.com
lmh@eslawfirm.com
abb@eslawfirm.com
atrowbridge@daycartermurphy.com
sas@a-klaw.com
californiadockets@pacificcorp.com
michelle.mishoe@pacificcorp.com
carmine.marcello@hydroone.com
MWT@cpuc.ca.gov
SMK@cpuc.ca.gov
ahl@cpuc.ca.gov
agc@cpuc.ca.gov
clu@cpuc.ca.gov
ctd@cpuc.ca.gov
crv@cpuc.ca.gov
cwl@cpuc.ca.gov
bsl@cpuc.ca.gov
eks@cpuc.ca.gov
fxg@cpuc.ca.gov
fcc@cpuc.ca.gov
gtd@cpuc.ca.gov
jw2@cpuc.ca.gov
jzr@cpuc.ca.gov
lau@cpuc.ca.gov
lwt@cpuc.ca.gov
mc3@cpuc.ca.gov
ska@cpuc.ca.gov
pva@cpuc.ca.gov
rmd@cpuc.ca.gov
rl4@cpuc.ca.gov
scr@cpuc.ca.gov
ahuang@arb.ca.gov