

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



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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)

**COMMENTS OF SAN DIEGO GAS & ELECTRIC COMPANY (U 902 M) ON
ADMINISTRATIVE LAW JUDGE'S RULING**

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Dated November 12, 2010

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**I.
INTRODUCTION**

Pursuant to the Commission's Rules of Practice and Procedure and the Administrative Law Judge's October 27, 2010 Ruling Requesting Additional Information and Setting Comment Schedule ("Ruling"), San Diego Gas & Electric ("SDG&E") respectfully submits its comments in response thereto. SDG&E appreciates the opportunity to respond to the Commission's inquiry seeking additional information, the receipt of which will help the Commission reach an informed and workable decision to better support the deployment and growth of plug-in electric vehicles ("PEV") in California.

SDG&E views California's PEV future as bright and robust, but only if the Commission, in taking the lead to help bring this nascent industry into being, is prudent and patient in its activities and oversight. SDG&E is encouraged that the Commission is on the right path. SDG&E's comments offered below urge the Commission to view the diverse nature of the three investor owned utilities ("IOUs") service territories, tariffs, rate schedules, relationships with PEV manufacturers, and relationships with PEV stakeholders as three different, but complimentary, venues to bring a robust PEV market into being in California. SDG&E submits that it would be imprudent and counterproductive of the Commission's PEV market development goals to prematurely adopt a "one size must fit all" strategy for each of the wide variety of PEV related issues it is considering. The Commission should allow the IOUs to work cooperatively but individually to aid PEV market development. SDG&E's comments are intended to aid the Commission in this regard.

II. COMMENTS

1. Separate Meter Costs

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

Each individual customer should bear the costs associated with a separate meter. The cost associated with such meter is incurred for the customer's direct benefit and therefore the responsibility for the costs incurred is that customer's direct responsibility. Currently SDG&E does not have a PEV meter charge, but instead recovers the meter cost through its general distribution charges, which are borne by all SDG&E ratepayers. Until January 1, 2010 SDG&E did have a TOU meter charge in its EV-TOU options. The TOU meter charge was removed since SDG&E agreed to a certain revenue allocation of Smart Meter costs in the AMI settlement.¹ SDG&E will review the appropriate methodology for allocating meter costs to customers, whether via a separate meter charge or through distribution rates in the next GRC rate proceeding.

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

Determining the mechanism for collecting costs of a separate meter for PEV charging should not be prescribed at this time. Rate design needs to be done holistically and is not reasonably done component by component. A comprehensive approach is required to be sure that the tariff as a whole makes sense. However, in general, meters represent fixed costs to the utility, which are most efficiently recovered through fixed charges.

2. Submetering Protocol

As noted in its comments to the Staff Issues Paper entitled *Utility Role in Supporting Plug-in Electrical Vehicle Charging* issued August 30, 2010 (First Issues Paper), SDG&E requested that the Commission allow time for the PEV market to develop beyond its formative stage today before committing to the potentially costly and time consuming option of submetering, with its related subtractive billing and back office support requirements:

¹ D.07-04-043.

SDG&E notes that before long term options such as submetering are adopted there should be careful consideration of key factors such as utility resources and protocols necessary to support the option, reasonable availability to all customers, the potential need for statewide standards and billing systems support, the incremental cost of that support (e.g., for subtractive billing) and the cost allocation, and the simplicity of the option. Additionally, SDG&E agrees that the Commission and utilities should actively monitor PEV and metering technology to identify new metering options or challenges in the future.²

SDG&E further explains in greater detail the additional requirements associated with the adoption of submetering and subtractive billing in its answer to Question 5 in the First Issues Paper (please see pages, 10 and 11).

a. What is the Commission’s role and the utility’s role in developing a submetering protocol?

As noted in SDG&E’s comments on the First Issues Paper (pages 4 and 8):

- **CPUC Sponsored PEV Metering Working Group** – The Commission and utilities should actively monitor PEV and metering technology to identify new metering options or challenges in the future. SDG&E recommends that the California utilities form a Commission-sponsored working group that identifies a common standard for EVSE-related metering. SDG&E stated:

This technical area is one that may require a more extensive discussion among the stakeholders. In order to most effectively meet challenges related to standards and testing of non-utility-owned PEV-EVSE meters, SDG&E recommends that the California utilities form a Commission-sponsored working group that identifies a common standard for EVSE-related metering.³

- **PEV Metering Certification** – As noted, the CPUC should also consider a role in approving a standard applicable to all EVSE-related submeter manufacturers that seek to have their metering equipment “certified” for use in California; all such certified equipment should be tested for compliance with the standard. As part of this certification process, the CPUC (or a party designated by the CPUC) should then maintain a list of EVSEs approved for submetering use in California. SDG&E stated previously:

Today, the utility has the responsibility to test and verify meter accuracy, regardless of whether the meter is installed before or after the customer point of service. This ensures that all aspect of metering standards are evaluated, including metering equipment accessibility, accuracy, security, communication compatibility, upgradeability, tamper resistance and meter identification. The CPUC should also consider a role in approving a standard applicable to all EVSE-

² Comments of San Diego Gas & Electric Company on Administrative Law Judge’s Ruling on First Workshop Issues Paper, September 20, 2010, pg. 1.

³ SDG&E Comments on First Issues Paper, pg. 4.

related submeter manufacturers that seek to have their metering equipment to be “certified” for use in California; all certified equipment should be tested for compliance with the standard. As part of this certification process, the CPUC (or a party designated by the CPUC) should then maintain the list of EVSEs approved for submetering use in California. California certification could be implemented and managed by an independent third party or by a designated utility. In general, SDG&E’s experience with third party meter providers in direct access has been inconsistent, at best. It would serve the State to take particular care to ensure that the adopted policy does not create problems, all in the name of creating meter markets. The key here is to promote PEV expansion. The development of metering options needs to be viewed in that context, not as an independent objective.⁴

As noted above, if an independent electrical testing and certification entity is selected to provide these functions, this entity would be responsible for ensuring all EVSE-related submeter manufacturers meet meter functionality and accuracy standards. Approved submetering devices would be “certified” for use in California. As part of this certification process, the CPUC (or a party designated by the CPUC) should then maintain the list of EVSEs approved for submetering use in California.

- **Support the Establishment of PEV Metering Standards** – A process similar to one used to develop the DASMMMD standards should be used to establish EVSE metering standards. Metering standardization will simplify and streamline a critical part of the process for consumers and Electric Vehicle Service Providers (“EVSPs”) in implementing PEV charging services and ensure the utility has the necessary information in a format that allows it to provide reliable service.⁵
- **Support the Establishment of System Standards** – SDG&E believes that under the Commission’s direction, utilities have the opportunity to create an open, interoperable architecture for communications to allow PEV charging networks to integrate with utility smart grid systems, making full utilization of existing and future utility infrastructure (i.e., Smart Meters and Smart Grid). This would reduce overall costs to market participants, increase efficiency of charging networks, reduce needless duplication of systems, and accelerate growth of the market overall.
- **Support Education and Outreach Efforts** – Electric transportation education and outreach programs sponsored by utilities are critical to increase the awareness among all its customers regarding PEV metering and related technology, in addition to the benefits of charging during the off-peak, and using technology to automate that process.
- **Back Office Systems and Support** – As noted in SDG&E comments to the First Issues Paper in discussions regarding utility resources necessary to support submetering (e.g., with systems to support subtractive billing where submetering is used), adequate back office

⁴ SDG&E Comments on First Issues Paper, pg. 4.

⁵ SDG&E Comments on First Issues Paper, pp. 4 and 8.

systems and support are essential.⁶ In addition, a submetering protocol should include recognition and recovery of costs necessary to implement submetering support systems essential to ensure successful system integration.

- **Support PEV Metering Research, Development and Demonstration (RD&D)** – Support the resources to research, assess and encourage emerging PEV metering and related technology development. Independent metering of PEV consumption will be critical for PEV-specific rates, earning Low Carbon Fuel Standard (LCFS) credits, and other potential applications (e.g., tracking electric transportation fuel usage for applying road use taxes) all depend on the emergence of reliable, accurate and low cost EVSE metering. Metering solutions must be developed for PEV charging using EVSEs and standard electrical outlets.

b. What other agencies need to lead or be involved in this process?

All standards development agencies associated with the meter accuracy and functionality, meter communications, security, protocol development, and compliance testing should be involved in this process. These could include:

- **California Department of Food and Agriculture Division of Measurement Standards (DMS)** This agency would provide the certification for accuracy of any non-utility metering technology used for public and residential billing. DMS may be able to provide ongoing submeter field and shop testing services to ensure meter data accuracy. Ongoing submeter accuracy testing is essential to ensure the accuracy of data used for customer billing. DMS may also be able to set metrology standards and limits for in-field testing to ensure accuracy of any submeter over the long term.
- **The California Alternative Energy and Advanced Transportation Financing Authority** This agency has probably not been involved in PEV or PEV Infrastructure in the past. However this could be a funding vehicle to speed up PEV adoption by funding researching and development of affordable sub-metering options.
- **California Building Standards Commission (BSC)** – This agency could:
 1. Review and approve PEV submetering charging standards proposed and adopted by state agencies;
 2. Codify and publish approved building PEV submetering charging standards for both public and private installations;
 3. Enforce proper installation of PEV facilities for both public and private installations
- **California Independent Systems Operators (CAISO)** – CAISO’s involvement may become necessary when metering requirement for providing Ancillary Services are explored.
- **California Air Resources Board (CARB)** – With the CARB’s involvement, issues pertaining to metering requirements for administering, tracking and reporting the Low Carbon Fuel Standards credits could be addressed.

⁶ SDG&E Comments on First Issues Paper, pp. 10-11; see also pp. 8-9. .

- **Contractors State License Board (CSLB)** – Contractors State License Board (CSLB) protects consumers by licensing and regulating California's construction industry. This agency could provide training to electrical contractors and require testing of new contractors related to installation and repair of PEV charging stations and sub-metering facilities.

c. What are the key issues to be addressed in a submetering protocol?

The key issues to consider when developing a submetering protocol include:

- **Meter Accuracy** – How does one ensure that a billing meter is accurate after installation and over time?
- **Data Security** – How is the integrity of the meter billing data maintained so that it can be used in calculating utility bills designed for electric utilities?
- **Meter Ownership** – Who will own and be responsible for the submeter used for PEV charging?
- **Meter Maintenance** – Who will maintain any submeter used for PEV charging and how will this maintenance activity be certified?
- **Agency Oversight** – Who will be responsible for the oversight of third parties who participate in and provide services related to PEV sub-metering? How will accountability for poor performance (e.g., not meeting standards) be identified and enforced?
- **AMI** – If non-utility entities are allowed to submeter PEV residential installations, how will they interface with CPUC approved AMI meter communication systems and meters?
- **Metering PEV's Only** – How will measured PEV energy consumption actually be tracked to a specific PEV vehicle?

d. Should the Commission consider adopting the metering and meter data requirements similar to the requirements developed in Decision 98-12-080 regarding direct access for PEV submeters?

Yes. All PEV meter devices should adhere to ANSI metering standards. These ANSI standards are listed in Decision 98-12-080. ANSI standards must be followed to ensure customer data meets accuracy and integrity standards for billing.

3. Utility Customer Education & Outreach

a. What specific changes, if any, should the Commission consider to the proposed language above?

The Commission's language is sufficiently broad enough to include the critical elements of education and outreach: "...to facilitate customer awareness of tariff options, technology options, billing options, installation options, and load management options...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.”⁷

Given the importance of this area of work, for clarification, SDG&E offers more specificity in defining the scope of education and outreach needs, as well as identifying the various customer and stakeholder segments targeted for education and outreach services.

Focus and Objectives

A central focus for utility education and outreach services is to provide customer and stakeholder support and assistance for SDG&E customers purchasing or considering purchasing a plug-in electric vehicle and/or charging facilities (i.e., for home, multi-dwelling units, commercial & public).⁸ The primary objective of PEV customer education and outreach is to give customers and stakeholders the information and assistance they need on a continuing, timely basis to ensure the safe, reliable and efficient integration of vehicle charging with SDG&E’s electric distribution system.

Scope and Customer Segments for Education and Outreach

Education and outreach encompasses a wide variety of delivery channels, including but not limited to seminars, workshops, field support, community events, and residential, commercial customer and stakeholder meetings to serve a broad diversity of customer segments: residential single family, multi-dwellings units (an area with the greatest diversity of building configurations, homeowners’ associations, and multi-dwelling unit specific Codes, Covenants & Restrictions), public and private charging entities, commercial PEV fleet operators, electric vehicle service providers (including electrical contractors and installers), and auto dealerships and manufacturers. Multiple parallel and mutually reinforcing communication channels and vehicles must be used to impart this information in a variety of convenient and accessible ways to a broad diversity of customers and stakeholders. These include frequently updated communication materials through a variety of related media, such as print, radio and television communications, printed material, mailers, bill inserts, collateral and exhibits for trade and community events/seminars, web sites, regional demonstrations, and announcements.

⁷ See Administrative Law Judge’s Ruling Requesting Additional Information and Setting Comment Schedule, October 27, 2010, Rulemaking 09-08-009, pp. 4-5.

⁸ SDG&E considers “multi-unit dwellings” or MUDs to reference a more diverse and comprehensive mix of building configurations than assumed under the term “multi-dwelling units or MDUs”.

The Subject Matter and Delivery Channel for Education and Outreach

Informational Support provides general information and education in a neutral and balanced manner to all ratepayers and PEV stakeholders to facilitate customer awareness of tariff options (including related metering requirements), technology options, billing options, installation options, and load management options, as well as more specific information to assist those customers considering purchasing an electric vehicle and/or the installation of a charging facility. SDG&E agrees with the Commission that the utility should be prepared to answer common customer questions regarding available PEV rates, usage and bill impacts, as well as objectively discuss options with current and future photovoltaic (PV) customers who are considering PEV charging at a premises with a PV system. Information regarding community charging facility options and availability will help reduce “range anxiety” (i.e., consumer fear that the PEV will not have enough charge to reach a destination). It is essential to ensure that residential and commercial customers are educated as to the benefits of off-peak charging in order to become familiar with technology that enables off-peak charging practices and integrated communication capability with the utility grid. This should also include critical technical and safety information relating to charging facility installation and maintenance. Much of the informational support can be delivered in collaboration with other stakeholders active in the PEV market and related trade associations, and well as local government and related agencies (e.g., for SDG&E, San Diego Association of Governments Regional Alternative Fuel Planning Committee).

Customer Training & Safety should focus on safe, reliable and efficient integration of PEV charging with SDG&E’s grid, and will include, but not be limited to: PEV vehicle charging best practices; vehicle and charger orientation and maintenance requirements; and recommended measures for charger facility operation, emergency responder training community, coordination, maintenance and repair. There is a growing need and role for utilities to collaborate with other stakeholders to establish standards for PEV related contractor training. The Commission should consider ways and means, consistent with its scope of its authority, to satisfy this need.

PEV Fleet Customer Assistance should provide economic analysis services for fleet customers to assist with comparing PEV vehicle and charging equipment options with other alternatives. Materials would also be used to educate fleet operators regarding federal, state and local programs, regulations, legislation, related initiatives, applicable codes and standards. A critical

part of education and outreach with fleet customers would include work with automotive manufactures.

Customer and EVSP Infrastructure Support is necessary to provide field support with charging infrastructure development and deployment with third party, customer and home and non-home (i.e., commercial and private) PEV charging facility construction, operations and maintenance. Because the task of serving customer needs in multi-dwelling units for both residential and commercial settings is diverse and complicated, education and outreach activities will necessarily grow in the near term to meet the unique attributes of this customer and building type segment. Education and outreach should also support and collaborate with the growing number of EVSPs, some with OEM affiliations (at least at this early stage when some have declared partnerships), to meet their needs in serving the PEV market. Finally, while it is important to coordinate education and outreach activities with related customer support services for immediate operational PEV charging infrastructure and charging facilities, this effort should also be targeted to support the planning and development of future PEV charging facilities. The scope of this latter activity could include technical education, demonstration projects and technical resource development as the need for integration with utility Smart Grid assets becomes essential. It is expected that this education and outreach effort will expand as the ownership of the home, public and commercial charging facilities grows in volume and diversity.

PEV Location Information Clearinghouse As discussed in this rulemaking proceeding and before the California Legislature, there is a strong need for early notification from auto makers/dealerships identifying the specific location of PEV consumers to help utilities to proactively manage local distribution system impacts due to PEV charging. SDG&E is working together with the other California investor-owned and publically-owned utilities to explore the creation of a data clearinghouse that would provide a secure and confidential notification system regarding customer-locations specific data to utilities when a customer purchases or registers a PEV in California. The California utilities are exploring with various stakeholders, including PEV automakers, electric vehicle service providers, cities, counties, municipalities, and the California Department of Motor Vehicles on how such a data clearinghouse could be structured. SDG&E recommends that the Commission approve and fund a study to evaluate the feasibility of such a clearinghouse.

b. What limitations, if any, should the Commission place on the utility in implementing customer outreach and education programs to avoid unfair competition with non-utility entities?

It is too early in the nascent development of the plug-in electric vehicle market to place arbitrary limits on utility customer education and outreach. As with any utility sponsored customer education and outreach effort, the information will be presented in a neutral and objective manner, with no preference to a particular rate, metering arrangement, charging technology or installer, or any other PEV product and service related matter. However, SDG&E intends to continue to encourage PEV consumers to act in a manner that ensures the safe, reliable and efficient integration of PEV charging with the utility grid (e.g., to charge their vehicles during the off-peak). More importantly, the utility plays a vital central coordination role for education and outreach by including all stakeholders and business entities in delivering the above content described above. Collaboration with stakeholders will help ensure that all entities active in the PEV market will play a role in growing the market. This approach allows education and outreach to build a critical foundation upon which all PEV service providers can grow their business interests in this market, could help to lower their business costs, and creates a more efficient and balanced means of building awareness and PEV knowledge. SDG&E will work with the CPUC to develop guiding principles for the implementation of education and outreach content.

4. Roadmap for Revisiting Rate Design

{M}ost parties agreed ...that time-variant PEV rates were sufficient for the early market....This ruling seeks input from parties to gain additional understanding on a potential timeline for when the Commission should direct utilities to revisit existing PEV rates: Parties are requested to recommend a procedural timeline for when the Commission should revisit PEV rate design.

PEV rates should be considered in the context of each IOU's different PEV market development experiences along with their corresponding unique system impacts. In addition, a host of other factors will impact PEV rate design as well, including both the scalability of existing electric rates and appropriate cost recovery of transmission and distribution system impacts. These factors are best considered together in each utility's rate design window, GRC Phase 2, or other appropriate proceeding.

5. Electric Vehicle Service Provider (EVSP) – Applicable Rate Schedules

a. For electric vehicle charging in non-residential settings, what rate schedule(s) should customers with electric vehicle charging qualify for (e.g., General Service or a new EVSP rate schedule) and why?

Existing applicable rate schedules for which EVSPs would otherwise qualify are currently sufficient. Electric vehicle charging, whether accomplished by equipment owned and operated by the ratepayer or by a third-party EVSP, should pay the same electric rates based on cost-causation. Setting rates that discriminate according to the party that ultimately interfaces with the end user would undermine healthy market development. There should be no attempt at this time to predetermine the appropriate business structure(s) to serve this market and therefore the ownership or operation of the EVSE should not impact electric rate design.

b. For electric vehicle charging in residential settings, what rate schedule(s) should customers with electric vehicle charging qualify for (e.g., residential, General Service or a new EVSP rate schedule) and why?

See response to question 5 a.

c. What special conditions, if any, should be added to existing rate schedules pertaining to electric vehicle charging?

Consideration should be given to provide accurate price signals to encourage off peak charging. Time variant and dynamic rates provide such signals. To the extent that a particular rate schedule does not provide such encouragement it may be reasonable to disqualify PEVs. Additional research would be required to determine if this would be appropriate.

d. What changes to Electric Rules are needed, if any, in the near-term pertaining to electric vehicle charging and why?

SDG&E's current Electric Rules are sufficient in the near term and no changes are needed or requested. The reason no changes are needed is that the existing SDG&E line extension Rules 15 and 16 already provide for the extension of electric Distribution Lines and the Utility Service Facilities to furnish Permanent electric service to Applicants. These Rules outline the work and cost responsibilities of the Applicant and the Utility and provide not only for the extension of facilities but also, under Rule 15.I.1, for the relocation or rearrangement of existing facilities. Additionally, should any situation arise that appears to be impractical or unjust to either the Applicant, the Utility or the Ratepayer, Rule 15.I.3 provides for treatment as an Exceptional Case, whereby any party may refer the matter to the Commission for a special

ruling or for special conditions which may be mutually agreed upon. In this context, PEVs should simply be regarded as a “new load” and served under the current extension Rules 15 and 16. Since the creation of these two extension Rules, new electronic devices have been brought to the market which have been added to the customer’s electric load without the need to change the Electric Rules. PEVs do not require any special service and the addition of their load to an Applicant’s premise should not be treated any differently than when a customer adds air conditioning, a pool or spa or a room addition.

6. Smart Grid Overlap Issues – Schedule Modification

Should the Commission direct utilities to include cost-effective “smart charging programs” targeting PEV charging in their next Demand Response application?

As an option, customers with PEV should be able to participate in load management activities through existing utility sponsored Demand Response (DR) programs or in other load management initiatives, including those associated with special rates or incentive-based rates. However, without electric vehicle usage data at this time, it will be difficult to establish accurate PEV usage baselines initially for estimating load reduction for analysis and settlement. While this may be a reasonable goal in the mid to longer term horizon, for the near term, utilities should not be required to include “smart charging programs” in the DR filing, due January 31, 2011 for the reasons detailed below.

Given the relatively low penetration rates expected over the next 3 years, the potential DR opportunity will be too small to warrant a custom designed DR program for PEVs. More importantly, a reasonable timeframe must be allowed to develop baseline usage information for home and non-home sites so an IOU will be able to accurately identify potential PEV load management scenarios. It would make sense to have discussions with customers interested in non-home charging facilities during this time frame on how they intend to manage these loads prior to assuming an interest.

Over the near term, large commercial sites can aggregate their entire load, including PEV, and participate in DR programs and rates. This diverse load mix provides greater management flexibility and therefore, should be the preferred strategy prior to considering PEV load specific demand response programs (e.g., total premises-based load management options may take priority over separating out charging station loads).

In the context of networked charging stations and DR (e.g., public access systems), charging entities may consider creating separate operational or program efforts outside of utility sponsored DR programs, such as working directly with the CAISO in the ancillary services market by controlling the rate of charge, by time of day.

Dated November 12, 2010.

Respectfully submitted,

By /s/ Steven D. Patrick
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CERTIFICATE OF SERVICE

Pursuant to the Commission's Rules, I hereby certify that I have this day served a copy of the foregoing **COMMENTS OF SAN DIEGO GAS & ELECTRIC COMPANY (U 902 M) ON ADMINISTRATIVE LAW JUDGE'S RULING** on all parties of record in **R.09-08-009** by electronic mail and by U.S. mail to those parties who have not provided an electronic address to the Commission.

Copies were also sent via Federal Express to Administrative Law Judge Regina DeAngelis and Commissioner Nancy Ryan.

Dated at Los Angeles, California, this 12th day of November, 2010.

 /s/ Marivel Munoz
Marivel Munoz

CALIFORNIA PUBLIC UTILITIES COMMISSION
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