

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA



FILED
9-12-14
04:59 PM

Order Instituting Rulemaking to
Consider Alternative-Fueled Vehicle
Programs, Tariffs, and Policies.

Rulemaking 13-11-007
(Filed November 14, 2013)

**OFFICE OF RATEPAYER ADVOCATES
REPLY COMMENTS ON ASSIGNED COMMISSIONER'S
SCOPING MEMO AND RULING**

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September 12, 2014

I. INTRODUCTION

Pursuant to the *Assigned Commissioner's Scoping Memo and Ruling* (Scoping Memo), issued on July 16, 2014, the Office of Ratepayer Advocates (ORA) replies to the comments of Charge Point and Southern California Edison Company (SCE) with regard to the questions posed in the Scoping Memo.

II. DISCUSSION

A. Chargepoint

Chargepoint recommends that the utilities' ratepayers should pay for utility financing of "make-ready"¹ and installation of Electric Vehicle Supply Equipment (EVSE) part of charging infrastructure.² The "make-ready" part of charging infrastructure is generally the most expensive part of the charging infrastructure for existing homes and other structures.³ Most of the costs related to make-ready work are the result of digging trenches and installing new lines and possibly new transformers.

In Decision (D.)13-06-014, the Commission concluded that until June 30, 2016, the costs of installing charging infrastructure in excess of the allowances under Electric Rules 15 and 16 (line extension rules) should be considered common facilities and should be paid for by ratepayers.⁴ "Make ready" facilities, as proposed by Chargepoint, would be considered common facilities, and are to be paid for by ratepayers until June 30, 2016. ORA recommends that the Commission revisit this issue to determine the issue of ratepayer subsidization using a cost-benefit analytic approach to determine how much

¹ Make-Readies lay the groundwork—such as conduits, power upgrades, and stubs—for equipment installation to occur later, as well as all electrical components required to supply power to an Electric Vehicle Supply Equipment such as cords, panels, wiring, transformers, etc.

² Chargepoint comments, p.13.

³ ORA supports "make-ready" work to be done for new construction by the developers.

⁴ D.13-06-014, Ordering Paragraph #1: Pacific Gas and Electric Company, Southern California Edison Company, and San Diego Gas & Electric Company shall extend the interim policy adopted in D. 11-07-029 to allow plug-in electric vehicle charging costs in excess of the Electric Tariff Rules 15 and 16 allowances to be treated as common facility costs, referred to as the Common Treatment for Excess plug-in electric vehicle Charging Costs, as described in this Decision, until June 30, 2016.

ratepayers should subsidize the cost of infrastructure in addition to the amount allowed in Rules 15 and 16, beyond the June 2016 sunset date.

B. Southern California Edison

SCE's comments refer to a plug-in electric vehicle (PEV) pilot program similar to San Diego Gas & Electric's (SDG&E's) Vehicle-Grid Initiative Application (A.)14-04-014, which it will propose in an application to be filed in October 2014.⁵ SCE's pilot program includes installing SCE-owned charging infrastructure at long-dwell-time locations outside of single-family homes (e.g., workplaces, campuses, fleets, multi-unit dwellings, destination centers). SCE states the application "will describe SCE's plan to install utility-owned charging stations and supporting infrastructure through a limited-duration program aimed at rapidly improving customers' ability to charge electric vehicles (EVs) away from a single-family home."⁶

SCE's comments do not indicate the scale of its planned VGI pilot program is. However, if its pilot is similar in scale to SDG&E's, it may place too much risk on the ratepayers, and prevent EVSE market penetration by the private sector. ORA supports the Governor's goal of 1.5 million PEVs in California by 2025, but supports pilots that are smaller in scale than the utilities proposals to determine if the proposed Vehicle-to-Grid Integration (VGI) programs will be effective in encouraging more PEV purchases before implementing full scale VGI Programs. ORA supports starting smaller pilots in parallel with the PEV OIR proceeding. However, before adopting full-scale VGI programs the Commission should adopt clear guidelines for the installation of charging stations, as well as ownership in this proceeding. Among the issues to be considered by the Commission in the PEV OIR proceeding before implementing full-scale programs are technological changes in electric vehicle supply equipment (EVSE) and market power

⁵ SCE Comments, p. 17.

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which may prevent private sector competition, as stated above and discussed in more detail in ORA comments in SDG&E's VGI application.⁷

III. CONCLUSION

ORA respectfully requests the Commission to consider ORA's suggestions stated above.

Respectfully submitted,

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⁷ A.14-04-014.