

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



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In the Matter of the Application of Pacific Gas  
And Electric Company (U 39 E) for Approval of  
its Electric Vehicle Infrastructure and Education  
Program.

Application 15-02-009  
(Filed February 9, 2015)

**PROTEST OF CONSUMER WATCHDOG TO  
PACIFIC GAS AND ELECTRIC COMPANY'S (U 39 E) ELECTRIC VEHICLE  
INFRASTRUCTURE AND EDUCATION PROGRAM APPLICATION**

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Dated: March 13, 2015

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Pursuant to Rule 2.6 of the California Public Utilities Commission (“Commission”) Rules of Practice and Procedure, Consumer Watchdog (“CWD”) submits this protest to Pacific Gas and Electric Company’s (“PG&E”) Electric Vehicle (“EV”) Infrastructure and Education Program Application (“Application”).

**I. Introduction**

Consumer Watchdog is a nationally-recognized, California-based, non-profit education and advocacy group organized under section 501(c)(3) of the Internal Revenue Code. Consumer Watchdog employs teams of public-interest attorneys, policy experts, strategists, public educators, and grassroots activists to advance and protect the interests of consumers and taxpayers. Founded in 1985, Consumer Watchdog's day-in, day-out consumer protection and advocacy work embraces a wide variety of issues affecting the daily lives and pocketbooks of millions of Americans. Consumer Watchdog has, since its inception, been particularly involved in representing the interests of consumers in regulatory matters, including the interests of utility ratepayers in California. Consumer Watchdog’s campaign affiliate qualified 1998’s utility rate reduction Proposition 9 for the statewide ballot to return money to PG&E, SCE and SDG&E ratepayers on their electricity bills. Consumer Watchdog is an SCE ratepayer, and its subscribers

include ratepayers of SCE, PG&E, and San Diego Gas & Electric. Consumer Watchdog and its more than 375,000 subscribers all pay the surcharges in their utility bills that substantially fund the CPUC's annual budget, as mandated in Public Utilities Code sections 401, 404, and 431.

Consumer Watchdog strongly believes that California's investor-owned utilities must be accountable to their ratepayers and to the diverse communities they serve. That is why we are submitting our opposition to PG&E's new proposal to monopolize electric vehicle charging infrastructure that will undoubtedly increase costs for ratepayers.

## **II. Protest**

Under its plan, PG&E will pass along the cost of installing 25,100 EV charging stations to all of its current ratepayers – regardless of whether or not they're EV drivers. That's a multimillion-dollar price tag that will show up on ratepayers' bills that we already know will be far more expensive than PG&E's previous projects.

Equally concerning is the unchecked, monopolistic control this proposal will give one company – a situation that never turns out in ratepayers' interests. Allowing PG&E to be the only decision maker with authority over the hardware, locations and pricing of this EV charging network will result in little to no incentive to keep costs low, particularly when these costs are being passed along to ratepayers.

Nor can we trust PG&E, which is the subject of ongoing scandal, to give consumers access to the most advanced technology for the least amount of money. After the deadly 2010 San Bruno gas pipeline explosion when California regulators rushed to order PG&E to improve the safety of an aging infrastructure, emails came to light showing how deeply the company was involved in helping a former PUC Executive Director write the very safety directive it was to receive. For years, PUC officials and PG&E executives exchanged thousands of emails,

strategizing on nuclear power plants, gas pipeline safety, and financial compensation in an unseemly display of lawlessness. This does not instill confidence.

To be clear, we support the EV industry and EV adoption. But if PG&E is going to get involved in this industry, it must develop a plan that advances alternative energy solutions without unnecessarily burdening ratepayers. PG&E has already fallen short in servicing its current infrastructure and ratepayers. Giving it new monopolistic power over EV charging in Northern California only serves to repeat past mistakes and hurt the people who can least afford it.

### **III. Notice**

Please add the following persons to the service list for this proceeding:

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### **IV. Conclusion**

For all the foregoing reasons, Consumer Watchdog respectfully requests that the Commission reject PG&E's proposal.

Dated: March 13, 2015

Respectfully submitted,

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Liza Tucker  
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