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PG&E Electric Vehicle Charging Infrastructure - Phase 1 Pilot

ORA Position: The CPUC should approve PG&E’s “Compliant Proposal,” as modified by the Non-Settling Parties, in order to allow sufficient EV customer data to be gathered in an appropriately sized pilot program, while mitigating financial risk.

Comparison of Proposed Settlement vs. Modified Compliance Model

Issue	PG&E’s “Charge Smart & Save” Settlement Proposal	ORA’s Recommendations for Modified Compliance* Model	Program Benefit of Modified Compliance Model
EVSE Ownership	<p>Full utility ownership of new infrastructure and EVSE.</p>	<p>Make-Ready Ownership Model. The utility would own infrastructure up to, but not including, the EVSE.</p>	<p>Make-Ready model mitigates ratepayer cost by being paid for by site host with rebate incentives. Beyond this competition will offer greater benefit to customers by achieving deployment goals, yet keeping costs low with minimal ratepayer subsidy. PG&E has not demonstrated similar substantial benefits of utility ownership of charging stations.</p>
Targeted Market Segment	<p>All market segments:</p> <ul style="list-style-type: none"> ▪ Commitment: 20% MUDs ▪ Aspirational Goal: 50% MUDs 	<p>Multi-Unit Dwellings (MUDs) and Disadvantaged Communities (DACs) only to target hard to serve markets. 50% commitment to MUDs.</p>	<p>MUDs and DACs are widely recognized as EVSE market segments that are difficult to penetrate and thus are ideal segments for PG&E to target, given they are not currently served by the competitive market.</p>

* September 24, 2015 Ruling directed PG&E to file supplemental testimony proposing an initial phase of EV charging station deployment, limited to 10% of PG&E’s originally proposed 25,000 L2 EVSE and 100 DCFC over no more than 24 months.



Issue	PG&E's "Charge Smart & Save" Settlement Proposal	ORA's Recommendation for Modified Compliance Model	Program Benefit of Modified Compliance Model
Program Size	<p>7,500 L2 Ports - over 3 years. The number of associated EVSE is undetermined.</p>	<p>2,500 L2 EVSE (~5,000 L2 ports) – over 2 years. It is possible that this could result in 5,000 L2 ports if dual-port technology is utilized.</p>	<p>Focuses Phase 1 on optimal data collection levels with sufficient diversity, resulting in more timely results to support the state's goals.</p> <ul style="list-style-type: none"> ▪ Allows CPUC to benefit from lessons-learned and improve program before expanding to a sustainable model. ▪ Considers multiple charging station projects deployed alongside PG&E pilot. ▪ Sets appropriate criteria, and avoids diminishing returns from an over-sized pilot. ▪ Mitigates risk of creating stranded assets.
Program Cost	<p>\$160 million</p>	<p>\$87 million Any savings realized in Phase 1 may be applied toward deployment of additional L2 EVSEs during the transition period between Phases 1 and 2.</p>	<p>\$87 million is the cost necessary to achieve the optimal program size for Phase 1.</p> <ul style="list-style-type: none"> ▪ Oversized pilot ratebase unnecessarily increases cost to ratepayers. ▪ Pilot savings can shift to bridge-funding transition.
DC Fast Charger Deployment	<p>Deployment of 100 Direct Current Fast Charging (DCFC) stations.</p>	<p>Deployment of 10 Direct Current Fast Charging stations.</p>	<p>DCFCs are several times more expensive to deploy than L2 EVSE, which is a concern if costs are stranded due to changing technology and other programs.</p>
Participation Payment	<p>Participation payments waived in DACs. DACs are defined as areas that scored within the top quartile of CalEnviroScreen 2.0 scores (CalEPA).</p>	<p>Participation payment waived only for MUDs that are within DAC's.</p>	<p>Ensures that only MUDs that really need subsidies for deployment receive them, resulting in using ratepayer funds most efficiently and accountably to achieve the state's goals.</p>