PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Item #4 (Rev.1)
Agenda ID 12954

ENERGY DIVISION **RESOLUTION E-4651**
June 26, 2014

R E S O L U T I O N

Resolution E-4651. Southern California Edison Company, San Diego Gas and Electric Company, and Pacific Gas and Electric Company request to implement a Plug-In Electric Vehicle Submetering Pilot (PEVSP) in Compliance with Decision 13-11-002.

PROPOSED OUTCOME: This Resolution approves the utilities' Schedule Plug-In Electric Vehicle Submetering Pilot tariff with modifications and requires filing revised tariffs within 14 days.

SAFETY CONSIDERATIONS: Based on the information before us, Schedule Plug-In Electric Vehicle Submetering Pilot does not appear to result in any adverse safety impacts on the facilities or operations of the utilities.

ESTIMATED COST: Maximum potential costs associated with tariff terms herein may total $4,636,667 (SCE), $3,304,667 (SDG&E), and $3,121,667 (PG&E)

By Advice Letters SCE 2993-E, PG&E 4343-E, and SDG&E 2566-E Filed on January 21, 2014.

SUMMARY

Southern California Edison Company ("SCE"), Pacific Gas and Electric Company ("PG&E"), and San Diego Gas and Electric Company ("SDG&E"), or collectively the joint investor-owned utilities ("IOUs") request approval of Schedule PEVSP to implement pilots to demonstrate Plug-In Electric Vehicle Submetering. Schedule PEVSP and its attached Agreements will be modified to comply with the requirements of Decision ("D.") 13-11-002, in which the Commission ordered the implementation of Submetering pilots to understand the requirements of and customer experiences with non-utility plug-in electric vehicle submetering. The IOUs' request to proceed with the pilot is approved.

BACKGROUND

D.11-07-029 in Rulemaking ("R.") 09-08-009 established requirements for the three large electric investor-owned utilities, SCE, PG&E, and SDG&E, to develop rules to incorporate customer-owned submeters into their billing and metering system for Plug-In Electric Vehicles ("PEV"). In response, the IOUs developed a draft report, Strawman for Plug-In Electric Vehicle Submetering Protocol. D.13-11-002 modified the PEV Submetering Protocol requirements set forth in D.11-07-029, adopting the Energy Division Staff PEV Submetering Roadmap (included as Attachment 1 to the Decision) for a two-phase pilot project. Ordering Paragraphs 2, 3, and 6 of D.13-11-002 require the IOUs to submit a Tier 2 advice letter with seven items, which were respectively filed as follows:

Ordering Paragraph, Item	**Attachment to AL**, Title	# in Res.
Not explicitly ordered by D.13-11-002	**A**, Schedule Plug In Electric Vehicle Submetering Pilot ("PEVSP") Phase 1 Utility Pro Forma Tariff	1
OP 2, Customer Enrollment Form	**A**, Customer Enrollment Agreement-Electric Vehicle Submetering Pilot (Phase 1)	2
OP 2, MDMA Registration Form	**A**, EV Submeter Pilot Phase 1 Submeter MDMA Registration Agreement	3
OP 2, Metering Requirements provided by Energy Division to the IOUs	**A**, Attachment 1 to MDMA Registration Agreement, Performance Standards for Metering and Meter Data Management Agents	4
OP 2, MDMA Service Requirements		
OP 2, Draft versions of the data format template	**A**, Attachment 2 to MDMA Registration Agreement, Data Reporting and Transfer Requirements	5
OP 3, Preliminary budget for the pilots	**B**, Preliminary Pilot Program Budget for each IOU	6
OP 6, Timeline for the submetering pilot evaluation process	**C**, Pilot Evaluation Process Timeline	7

This resolution reviews these documents for compliance with D.13-11-002 and refers to them with the numbering convention above.

NOTICE

Notice of SCE AL 2993-E, PG&E AL 4343-E, SDG&E AL 2566-E ("Joint AL") was published in the Commission's Daily Calendar. The IOUs state that a copy of the Advice Letter were mailed and distributed in accordance with General Rule 3.14 of the Commission's General Order 96-B. The IOUs assert that it distributed the AL to the service lists of R.09-08-009 and R.13-11-007 to consider Alternative-Fueled Vehicle Programs, Tariffs, and Policies.

PROTESTS/COMMENTS

The Joint Advice Letter received protests from ChargePoint Inc. ("ChargePoint"), Glen Canyon Corporation ("Glen Canyon"), Green Power Institute/Community Environmental Council ("GPI/CEC"), and Marin Clean Energy ("MCE"). The Joint AL received a timely response from the Office of Ratepayer Advocates ("ORA"). Protests and responses were received timely on February 10, 2014. The Joint IOUs filed replies[1] to protests on February 18, 2014.

This section orders protests according to the protest's corresponding document attached to the AL. For each document, we first summarize protests that are relevant to overall pilot policies and objectives and second list protests that recommend minor or technical clarifications to specific terms or conditions.[2] The Discussion section of this resolution contains the merit and settlement of each protest using the same document numbering as shown in the table above.

1. Schedule PEVSP Phase 1 Utility Pro Forma Tariff

Unbundled Customer Eligibility

MCE protests that the proposed tariff's exclusion of Community Choice Aggregation ("CCA") customers would violate the competitive neutrality requirements of state law and D.12-05-037.[3] MCE asserts that pursuant to Assembly Bill 117 the IOUs are obligated to serve as MDMAs to CCAs and "…have no authority to refuse providing metering services necessary to

[1] PG&E filed a reply ("PG&E Reply") separately from the Joint IOUs' reply ("IOU Reply") to address MCE's protest.

[2] ChargePoint Protest, p. 9-13 and ORA Protest, p. 2-6.

[3] Protest of MCE ("MCE Protest"), February 10, 2014, p. 1.

participate" in the pilot. MCE cites P.U. Code 707(a)(4)(A) enacted through Senate Bill 790 to assert that allowing the IOU to provide a program that a CCA could not would be anti-competitive and result in cross-subsidization. To this point, MCE cites D.12-05-037 to assert that since the pilots are supported by all ratepayers via the Electric Program Investment Charge ("EPIC"), all ratepayers should be allowed to participate and benefit from the submetering pilot.[4]

ORA disagrees with IOUs' the justification that CCA customers "may add little value to the pilot study" and asserts that their exclusion would skew estimates for PEV submetering demand. ORA recommends for CCA customers to be included within the pilot.[5]

For CCA customers, PG&E replied to MCE's protest explaining that third parties, not IOUs, are permitted to operate as Submeter MDMAs in the pilot. PG&E describes billing process issues specific to MCE customers that would potentially result in costs from modifications to the unbundled service customer billing system and delays from subtractive billing. PG&E notes that MCE has not notified the Commission of its intent to participate in the pilot. PG&E replies that using EPIC funds for submetering can meet their objectives regardless of CCA customer participation and states that the results will be made available to all stakeholders consistent with the non-discrimination requirements of EPIC.[6]

For Direct Access ("DA") customers, IOUs explain that the intent to exclude DA customers originated from complexities in accounting for the SB 695 cap and obtaining permission from the Electric Service Provider ("ESP") and MDMA to participate. Given DA customer interest and a Commission finding of merit in their inclusion, IOUs were willing to support participation if (1) the DA customer's existing load includes their PEV load and (2) if the ESP and MDMA consent to their customer's participation and the terms of the pilot.[7]

The Commission discusses these matters in detail within the "Schedule PEVSP" section of the Resolution.

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[4] MCE Protest, p. 2.

[5] ORA Response, p. 2-3.

[6] PG&E Reply, p. 2-3.

[7] IOU Reply, p. 8.

Net Energy Metering Customer Eligibility

Glen Canyon and GPI/CEC disagree with the IOUs' proposed cap on the number of Net Energy Metering ("NEM") customers to 10% of the 500 eligible pilot participants per utility.[8] Instead, Glen Canyon recommends submetering NEM generation to simplify accounting.[9]

IOUs reply that it is justifiable to reduce the NEM participation cap because NEM customers, which account for 3% of the IOUs' total customer population, would be over-represented in the pilot. IOUs reply to GPI/CEC's protest on the proposed budget for billing NEM customers, stating that they determined reducing the cap could manage the higher labor costs of manual subtractive NEM billing while adequately measuring NEM customer experience. IOUs disagree with Glen Canyon's recommendation to submeter NEM generation for cost reasons.[10]

Protests or clarifications on terms and conditions

a) Reference to "Primary load" at p. 1
b) Incentive Payment termination/substitution at p. 2
c) Enrollment Period Duration at p. 3
d) Disenrollment and Change of address at p. 4
e) Ineligibility for Direct Pay Plan and Level Pay Plan at p. 4
f) Utility-specific safety requirements at p. 4
g) Limitation of 5 Submeters for each Primary Meter at p. 4
h) Validation, Editing, & Estimation in Submeter MDMA definition at p. 4
i) Definition of Primary Meter at p. 5
j) Reference to "Summary Bill" at p. 5

The IOUs were amenable to making typographic and other minor changes according to Energy Division direction.[11]

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[8] Protest of GPI/CEC ("GPI/CEC Protest"), February 10, 2014, p. 2 and Glen Canyon Protest, p. 2.

[9] Glen Canyon Protest, p. 2.

[10] IOU Reply, p. 3-4.

[11] IOU Reply, p. 8.

2. Customer Enrollment Agreement

IOU Assistance in Customer Recruitment

Glen Canyon suggests that the IOUs are in the best position to identify submetering pilot participants at the lowest overall cost.[12] Similarly, ORA recommends that the IOUs provide customer recruitment guidelines based on location and demography to "prevent unintended recruitment bias."[13]

The IOUs did not reply to this protest.

Equal Recruitment among Customer Sectors

ORA is concerned that the lack of an incentive specific to residential customers would result primarily in non-residential customers participating. ORA suggests that MDMAs be encouraged to evenly recruit customers in both the residential and commercial sectors to achieve more representative results. We reject this protest as the Decision recognized the potential for submetering to generally benefit other types of customers if it could be demonstrated in any one sector.[14]

Protests or clarifications on terms and conditions

a) Description of Survey/Testing at p. 1
b) Description of Installation at p. 2
c) Description of Participant responsibilities at p. 2
d) Description of disregarded information at p. 3
e) Ineligibility for other IOU programs at p. 4
f) Reference to IOU website at p. 4
g) Instructions to customer at p. 1
h) MDMA release of utility liability at p. 4

The IOUs were amenable to making typographic and other minor changes according to Energy Division direction.[15]

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[12] Glen Canyon Protest, p. 2.

[13] ORA Response, p. 5.

[14] D.13-11-002, p. 27-28.

[15] IOU Reply, p. 8.

3. EV Submeter Pilot Phase 1 Submeter MDMA Registration Agreement

Protests or clarifications on terms and conditions

a) IOU or Energy Division Standards at p. 2
b) Energy Division delegation of review at p. 3
c) Daily reporting at p. 4
d) Submeter Testing and Calibration at p. 4

The IOUs were amenable to making typographic and other minor changes according to Energy Division direction.[16]

4. Performance Standards for Metering and Meter Data Management Agents

Protests or clarifications on terms and conditions

a) Transfer testing at p. 11
b) Process updates at p. 12
c) Meter System Testing at p. 13

The IOUs were amenable to making typographic and other minor changes according to Energy Division direction.[17]

6. Preliminary Pilot Program Budget for each IOU

Estimation of Preliminary Budget

GPI/CEC protest that the IOUs' budget for the pilot, including the Customer Experience Evaluation and Manual NEM Billing Data are "exorbitant" and not sufficiently justified. GPI/CEC requests that the IOUs provide additional information detailing their budgets.[18]

IOUs reply that GPI/CEC's budget analysis misrepresents utility costs by not accounting for the three year length of the pilot and illustrate labor requirements

[16] IOU Reply, p. 8.

[17] IOU Reply, p. 8.

[18] GPI/CEC Protest, p. 4.

for PG&E. IOUs claim that the labor rates for a third party evaluator is an approximation for Request for Proposal bids for a similar scope.

Compensation of Non-Recurring Costs for Submeter MDMAs

ChargePoint protests that the AL's proposal to fund participating Submeter MDMAs is inconsistent with D.13-11-002's requirement that the utility propose "a reasonable per customer incentive payment."[19] ChargePoint asserts that the proposal is "fundamentally flawed to the extent that it does not include an additional incentive payment to compensate participating EVSPs/MDMAs for non-recurring costs" to create an accounting system, test equipment, recruit participants, and manage the pilot. Instead, ChargePoint requests that the Commission authorize one-time payments through a request for proposals ("RFP") or application process.[20]

The IOUs reply that the EVSP Coalition's[21] comments filed in Phase 3 of R.09-08-009 conflict with the protest, citing a statement that third parties would invest in submetering because the benefits "justify the cost of implementation" to develop technology and services.[22] In addition, the IOUs disagree that the non-recurring costs support fundamental functions of EVSP businesses that are not unique to the submetering pilots and offer "no established direct benefits to ratepayers." Second, IOUs believe that selectively funding the non-recurring costs for certain companies would provide an unfair competitive advantage to those that do not receive ratepayer funding. Third, IOUs assert that providing ratepayer funding for accounting systems would counter D.13-11-002's recommendation to manually process submeter billing to avoid the cost of upgrades.[23]

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[19] D.13-11-002 at 40-41.

[20] Protest of ChargePoint to Joint AL ("ChargePoint Protest"), February 10, 2014, p. 6.

[21] ChargePoint was one of three members in the EVSP Coalition.

[22] Comments of the EVSP Coalition on the Joint Utilities' Submetering Protocol Roadmap Report per the January 31, 2012 ALJ Ruling, p. 9.

[23] IOU Reply, p. 3.

Compensation of Recurring Costs for Submeter MDMAs

Noting that D.13-11-002 was silent regarding how incentives should be paid, ORA recommends that the enrollment incentive be shared equally between the Submeter MDMA and the customer, rewarding the customer if the Submeter MDMA does nothing to recruit the customer into participation.[24] Glen Canyon agrees that the IOUs' proposed incentive amount for MDMA services, as specified, is "fair and reasonable."[25] ChargePoint does not protest the enrollment incentive and monthly recurring payment for MDMA services.[26]

Non-Compensation Terms Affecting Submeter MDMAs

Glen Canyon asserts that the proposed "business terms for incentive payments are neither industry standard nor favorable [for the success of the pilot]." Instead, Glen Canyon recommends that contractual terms be subject to final negotiation between the Submeter MDMA and the IOU.[27] Glen Canyon repeated this sentiment in comments and furthermore questioned the ability to complete the required transactions "without an agreement."[28]

ORA recommends that the enrollment incentive be paid to the Submeter MDMA after three successful billing cycles instead the IOUs' proposal of 60 days after the date of each customer enrollment in order to motivate the MDMAs.[29]

IOUs reply that these suggestions do not comport with D.13-11-002, which directed the IOUs to create a "registration form that will allow any Submeter MDMA to participate." The IOUs reason that Schedule PEVSP is an open access tariff that avoids the length or complexity associated with negotiations or a

[24] Response of ORA to Joint AL ("ORA Response"), February 10, 2014, p. 6.

[25] Protest of Glen Canyon to Joint AL, ("Glen Canyon Protest"), February 10, 2014, p. 1.

[26] ChargePoint Protest, p. 6.

[27] Glen Canyon Protest, p. 2

[28] Glen Canyon Comments, p. 1.

[29] ORA Response, p. 4-5.

Request for Proposals, provides business terms and requirements needed for non-discriminatory participation.[30]

Availability of Commercial PEV Rates

Chargepoint asserts that the pilot must include PEV rates for commercial customers in PG&E's and SDG&E's territories. ChargePoint is concerned that, absent access to commercial PEV charging rates, participation will be limited because non-PEV rates in these territories may increase the otherwise applicable cost. ChargePoint recommends various incentives for commercial customers to overcome the lack of access to commercial rates including setting energy rates at a discounted or zero cost to the customer.[31]

IOUs reply by stating that rate design is not within the scope of the pilot and are being addressed in other venues. IOUs disagree with Chargepoint's suggestion to fully discount energy for commercial customers. However, IOUs suggest that a flat payment of $20/month using a direct mechanism may be a more appropriate and expedient way to incent PG&E and SDG&E commercial customers.[32]

DISCUSSION

On January 21, 2014, the Joint IOUs filed Advice Letter ("AL") SCE AL 2993-E, PG&E AL 4343-E, SDG&E AL 2566-E providing information required by the Commission in Ordering Paragraphs 2, 3, and 6 of D.13-11-002. In addition, the AL establishes a pro-forma tariff, Schedule Plug-In Electric Vehicle Submetering Pilot ("Schedule PEVSP"), to support the implementation of the pilot.

Specifically, the IOUs propose the establishment of the following tariff and agreements and request approval of a budget and evaluation timeline:

1. Schedule Plug In Electric Vehicle Submetering Pilot ("PEVSP") Phase 1 Utility Pro Forma Tariff

[30] IOU Reply, p. 7.

[31] ChargePoint Protest, p. 8.

[32] IOU Reply, p. 6.

2. Customer Enrollment Agreement- Electric Vehicle Submetering Pilot (Phase 1)
3. EV Submeter Pilot Phase 1 Submeter MDMA Registration Agreement
4. Performance Standards for Metering and Meter Data Management Agents
5. Data Reporting and Transfer Requirements
6. Preliminary Pilot Program Budget for each IOU
7. Pilot Evaluation Process Timeline

The IOUs note that the forms filed are generic versions and that they will be revised to include IOU-specific information, and resubmitted as Tier 1 Advice Letters for Commission approval.

Energy Division evaluated the Submetering Pilot documents based on the following criteria:

- Consistency with D.13-11-002, which in Ordering Paragraphs 2, 3, and 6 required the Investor Owned Utilities to file items to implement the Submetering Pilots
- Consistency with the Zero-Emission Vehicles Action Plan
- Cost Reasonableness
- Public Safety

Consistency with D.13-11-002

1. Schedule PEVSP Phase 1 Utility Pro Forma Tariff

While the creation of Schedule PEVSP was not specifically ordered by D.13-11-002, the IOUs developed a pro forma tariff that allows otherwise-ineligible customers to access PEV or commercial rates through a Submeter MDMA. The Commission considers parties' protests to the following terms in Schedule PEVSP. Party protested 12 items in the PEVSP Tariff Schedule: (a) Unbundled Customer Eligibility at page 1; (b) Reference to primary load at page 1; (c) Incentive payment termination/substitution at p. 2; (d) NEM account cap at page 3; (e) Enrollment period duration at page 3; (f) Disenrollment and change of address at page 4; (g) Ineligibility for direct pay plan and level pay plan at page 4; (h) Utility-specific safety requirements at page 4; (i) Limitation of 5 submeters for each primary meter at page 4; (j) Validation, Editing, and Estimation by Submeter MDMA at page 4; (k) Definition of Primary Meter at page 5; and (l) Reference to "Summary Bill" at page 5.

(a) Unbundled Customer Eligibility at page 1

Marin Clean Energy (MCE) and ORA expressed concern that Schedule PEVSP excludes CCA customers from participating. MCE argued that excluding CCA customers from the pilot would violate the legislation establishing CCAs (SB 970) and would be inconsistent with the principles of the EPIC program. SB 970, as MCE argues, requires that CPUC support fair competition between CCAs and IOUs. EPIC funding is required to benefit all ratepayers, not a "sub-segment of ratepayers."[33]

PG&E responded to MCE's concern based on two possible interpretations of MCE's request.[34] PG&E thought it was unclear whether MCE was requesting that it be allowed to be an MDMA, or whether it would like its customers to be able to participate in the pilot like bundled ratepayers. PG&E did not dispute MCE's ability to be an MDMA, but argued against MCE's customers participating in the pilot. PG&E thought that the meter data reporting requirements authorized by D.13-11-002 would complicate their participation in the pilot. D.13-11-002 requires that MDMAs submit their submeter data within 3 days, while utilities are required to submit billing data to the CCAs within 3 days, making it difficult for utilities to send timely billing data to CCA in cases where a submeter is used.

PG&E's dichotomy of options for CCA participation is useful for determining exactly what role a CCA and its customers will play in this pilot. In regards to being an MDMA, MCE did miss the original "Notice of Intent" deadline, however, this deadline was not intended to exclude parties from participating in the pilots as MDMAs. The registration deadline in the decision (April 1) was intended to serve as the formal registration deadline, while the January 3 deadline was purposefully "non-binding" and intended to facilitate communication between the utilities and potential MDMAs. If Decision 13-11-002 intended for the "Notice of Intent" deadline to be binding, the April 1st registration deadline would not have been necessary. MCE may still apply to be an MDMA provided it meets the requirements for an MDMA by the registration deadline. MCE argues that prohibiting CCA customers from participating will negatively impact a CCA's competitive position relative to the utility. We find

[33] MCE Protest, p. 2.

[34] PG&E Reply, p. 2.

this argument to be compelling, since submetering would be an additional service that only bundled customers would be able to access. PG&E does not refute CCA's competitiveness arguments, but rather argues that the participation of CCA customers introduces complexity in bill processing. Submetering in general introduces complexity in bill processing. The purpose of the pilot is to evaluate if the complexity required is exceeded by the customer benefits of submetering. The complexity identified by PG&E would necessarily need to be addressed if submetering were fully implemented. Under this scenario, CCAs would be unprepared to accommodate submetering, putting CCAs at a competitive disadvantage to the IOU. To further the goals of the pilot and avoid the risk of CCAs finding themselves in a future competitively disadvantageous position, IOUs should include CCA customers in the pilot.

IOUs should revise Schedule PEVSP to allow participation by Community Choice Aggregator customers.

PG&E comments that it is willing to facilitate CCA participation, but states that additional processes are required to complete subtractive billing.[35]

If a CCA intends to enable their customers to participate in the pilot they shall notify PG&E as soon as practicable after this resolution is finalized. PG&E shall work with the CCA to determine a separate billing procedure to accommodate generation-specific PEV load necessary to accommodate MDMAs serving CCA customers.

Related to the matter of MDMAs submitting a Notice of Intent to the Commission, Glen Canyon requests clarification about whether a "non-registered" MDMA is eligible to participate and how they affect the implementation of Exclusivity Rights.[36] As discussed above, the NOI deadline was non-binding and intended to facilitate communication with the IOUs.

Consistent with the Executive Director's approval on April 7 of the IOUs' request, MDMAs are eligible to register with the Commission no later than 15

[35] PG&E Comments, p. 3-4.

[36] Glen Canyon Comments, p. 2.

days after this Resolution is approved. This extension of time does not modify the definition or calculation of Exclusivity Rights.

(b) Reference to "Primary load" at page 1

ChargePoint is concerned that the reference in the Applicability section to "primary load" may inadvertently exclude certain types of submetered PEV loads. ChargePoint identifies that commercial customers with multiple interval data recording meters or customers whose PEV load is "primary" (i.e. the greatest share of load) on a given meter may be excluded from the pilot with this interpretation. The Commission agrees that the use of "primary load" shall not exclude these cases. Consistent with the Submetering Roadmap[37], Schedule PEVSP must allow a PEV "to be billed off of a meter installed on the customer-side of the primary customer meter." Eligibility is not contingent upon the number of meters held or the share of a meter's total load associated with PEV charging. A Customer of Record may submeter their PEV load from their primary meter if it is connected or attached to said meter. No changes are necessary to the tariff to implement this clarification.

(c) Incentive Payment termination/substitution at page 2

ORA is concerned about the negative effect on the pilot if Submeter MDMAs fail to meet performance requirements and are subject to termination by an IOU petition to Energy Division. ORA suggests that the Commission order IOUs to notify the customer of this termination and to avail them the option to subscribe with an alternate Submeter MDMA. The proposed Schedule PEVSP language is consistent with the MDMA Performance Requirements.[38] However, ORA's suggestion is consistent with the Pilot Participation Period of 12 billing cycles, which continue at the discretion of the customer.[39] If a customer's submetering service is terminated as a fault of the Submeter MDMA, it is reasonable to allow them to reenroll with an alternative provider.

[37] D.13-11-002 Attachment 1, p. 2.

[38] D.13-11-002 Attachment 1, p. 18-19

[39] D.13-11-002, p. 26 and Attachment 1, p. 12.

The IOUs shall notify the customer if submetering service is terminated and allow them to complete the remainder of their Pilot Participation Period subject to completing the requirements to re-enroll with an alternative provider.

(d) NEM Account Cap at page 3

GPI/CEC and Glen Canyon protest the proposed reduction of the number of NEM customers eligible to enroll in the pilot from 25% to 10% of the total submeters. The Decision permitted the IOUs to propose to change the limit according to updated NEM/PEV adoption data or cost concerns.[40] We observe that the IOU territories generally saw a reduction in the number of NEM/PEV customers from the 2012 Load Research Report, which was the basis for the cap in D.13-11-002. In the 2012 Report, the IOUs reported that NEM customers comprise 21%, <24%, and <25% of PG&E, SCE, and SDG&E's single metered PEV customers, respectively. [41] As of August 2013, the IOUs report that NEM customers comprise 18%, 25%, and 17% of PG&E, SCE, and SDG&E's single metered PEV customers, respectively.[42] GPI cites the Load Research Report's note that these percentages reflect only NEM/PEV customers that subscribe to PEV-specific TOU rates to suggest that the cap is too conservative.[43] Glen Canyon also suggest piloting NEM/PEV subtractive billing in proportion to demonstrated adoption rates to maximize emissions reductions.

We recognize the potential interest from early adopters. The IOUs' budget estimates suggest that manual billing for each NEM customer would cost 4 to 13 times the amount for non-NEM customers.

We recognize the possible great interest in the Pilot from early adopters of NEM and PEV technology. Consistent with the Decision's rationale to not apportion a minimum number of participants by customer segments due to the possible disproportionate benefits that an individual segment may receive,[44] and in recognition of demonstrated adoption levels, we will increase the NEM account cap. While the NEM/PEV percentages reported in the Load Research Report

[40] D.13-11-002, p. 27.

[41] Joint IOU Electric Vehicle Load Research Report, December 28, 2012, p. 13, 25, and 42.

[42] Joint IOU Electric Vehicle Load Research Report, January 31, 2014, p. 20, 54, and 82.

[43] GPI Comments, p. 4.

[44] D. 13-11-002, p. 27-28.

account only for customers that use PEV TOU rates, albeit a sub-segment of all PEV-owning customers, the Load Research figures were the basis for the permissible range set in the Decision. Given available IOU customer data, increasing the cap to reflect current adoption rates to 20% is consistent with the intent of the Decision. We also note that this reduction helps contain the expenses associated with a separate manual billing process.

Based on more recent adoption levels and in order to contain costs, it is reasonable for the IOUs to reduce the NEM enrollment limit to 20% (300) of total eligible submeters for Phase 1 of the pilot.

(e) Enrollment Period Duration at page 3

ORA identifies that the Enrollment Period is incorrectly stated as 5 months. Decision 13-11-002 established a 6 month enrollment period.[45]

The IOUs shall correct the length of the Enrollment Period to 6 months.

(f) Disenrollment and Change of address at page 4

Chargepoint requests that MDMAs be allowed 10 days instead of 5 days to report a drop-out or to include an exception to accommodate customers that move without notifying the Submeter MDMA. The Decision requires Submeter MDMAs to report these types of participants to the utility "as soon as possible prior to the start of the next billing period."[46] Pursuant to the pilot's guiding principle to support collaboration between stakeholders,[47] allowing 10 days for this report is reasonable. Chargepoint is reasonable to request that the utility share information on the customer's status. However, to protect customer privacy the IOUs shall limit the notification to information that is pertinent to the customer's participation in the pilot.

The IOUs shall allow 10 days for an MDMA to report a drop-out or change of address, and include an option that allows customers who change their address to continue in the pilot.

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[45] D.13-11-002, p. 29 and Attachment 1, p. 13.

[46] D.13-11-002 Attachment 1, p. 16.

[47] D.13-11-002, p. 19.

ORA asserts that this term is unclear whether customers that change their address will be permitted to resume submeter service at their new location. The term only discusses the reinstatement of the otherwise applicable tariff of the primary meter for all load. The Decision requires that a relocated customer resume submeter service coincident with the start of the next billing period.[48]

SCE is amenable to re-enroll relocated pilot participants contingent upon three clarifications which depend on the IOU service territory in which the customer relocates. We accept these as follows. For customers among the first 500 within a service territory that relocate within the service territory: 1) their MDMA must submit a separate Customer Enrollment Form for their new service address at least five days before the end of the current billing period; and 2) they are eligible to reenroll in the Pilot after the Enrollment Period. For customers that relocate to another IOU's service territory, they may reenroll if the IOU's 500 submeter limit has not been met.

<u>The IOUs shall revise the tariff to reflect these options for customers that move.</u>

(g) Ineligibility for Direct Pay Plan and Level Pay Plan at page 4

ORA and Chargepoint request the clarification or elimination of the term precluding customer participation in Direct Payment or Level Pay Plan programs. The IOU's reply that these exclusions are necessary to complete submetered billing via the Remittance Model and to accurately account the customer's monthly bill, respectively.[49] We recognize that Remitting payments for submetered load with the Level Pay Plan adds complexity to the billing system and that levelizing balances across months may be counterproductive to improving customer understanding of PEV load and costs. It is reasonable to disallow participants from using Level Pay Plan if their Submeter MDMA will remit payments on their behalf. With respect to Direct Pay Plan, we recognize that there may be complexities with implementing the Remittance Model. SCE recommends that pilot participants be ineligible for Direct Pay due to potential overbilling issues.[50] However, we are reluctant to exclude a potentially large amount of participants that subscribe to the Direct Pay Plan program. Similar to

[48] D.13-11-002 Attachment 1, p. 16.

[49] IOU Reply, p. 5. The Remittance Model was described on page 5 of Attachment 1 of D.13-11-002.

[50] SCE Comments, p. 2.

Level Pay Plan, it is reasonable to disallow participants from using Direct Pay Plan if their Submeter MDMA will remit payments on their behalf. Customers subscribed to Direct Pay Plan and/or Level Pay Plan prior to enrollment in the Pilot shall be unenrolled for the duration of the pilot. The IOUs shall add a line in the Customer Enrollment Form explaining the above terms restricting eligibility where the Submeter MDMA shall indicate whether or not the IOU will receive remitted payments to be credited toward the customer's account as part of receiving submetering service.

The IOUs shall extend pilot eligibility to Direct Pay Plan and Level Pay Plan customers if their submeter service does not involve remitting payments to be credited against their account. Customers currently enrolled with Direct Pay Plan and Level Pay Plan are eligible to participate in the pilot, but must unenroll from the programs for the duration of the pilot.

(h) Utility-specific safety requirements at page 4

Chargepoint requests the deletion of the requirement that submeters meet UL safety requirements or "comply with UTILITY's specific safety requirements." In the metering requirements sent from Energy Division to the IOUs, submeters are required to "meet UL safety requirements."[51] SCE emphasizes that submeters must meet (or be embedded in devices that meet) UL safety requirements or comply with the UTILITY's safety requirements to allow for broader participation in the pilot.[52] We find these requirements appropriately ensure the safety of submetering devices. No changes to the term are necessary.

(i) Limitation of 5 Submeters for each Primary Meter at page 4

Chargepoint requests justification or elimination of the limit of 5 submeters per primary meter. This limitation is inconsistent with the Decision's clarification of Eligibility for Submetering Services, which does not limit the number of submeters a Single Customer of Record may request.[53]

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[51] EV Submeter Pilot Phase 1, Submeter MDMA Registration Agreement, Attachment 1, p. 109.

[52] SCE Comments, p. 3-4.

[53] D.13-11-002, p. 26.

PG&E comments that their billing system is technologically constrained to 20 subaccounts and requests that submeter-to-submeter relationships be prohibited.[54] The Roadmap adopted in D.13-11-002 did not propose or contemplate the use of multiple levels of submeters and is not permitted in the pilot.

The IOUs shall limit 19 submeters per primary meter and restrict participants from using multiple levels of submeters.

(j) Validation, Editing, and Estimation by Submeter MDMA at page 4

Chargepoint requests revision or elimination of reference to Submeter MDMAs' use of CPUC-approved VEE methods. In the case of the Submetering pilot, the CPUC-approved VEE method was to be determined collaboratively by the IOUs and MDMAs and be built upon the Strawman PEVSP where possible.[55] Per the IOU's proposed VEE Performance Standards, MDMAs are not required to meet requirements for Direct Access Customers.[56]

PG&E comments that during a January 3, 2014 meeting, the MDMAs had not expressed concerns with the IOU proposal to exempt the MDMAs from the VEE requirements for Direct Access customers.[57] PG&E clarifies that there is diminished value in VEE-ing Single Customer of Record submeter data because an individual customer is responsible for the usage allocated to two electric bills. However, since this is not the case for Multiple Customers of Record, PG&E requests that the Commission revisit this issue in advance of Phase 2.

The IOUs collaborated with the MDMAs to determine that validating, editing, and estimating interval data is not required for Single Customer of Record submetering , as required by D.13-11-002. The IOUs will revise VEE terms to complete Multiple Customer of Record submetering.

(k) Definition of Primary Meter at page 5

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[54] PG&E Comments, p. 5.

[55] D.13-11-002 Attachment 1, p. 18.

[56] Attachment 1, Performance Standards for Metering and MDMAs, Section G, p. 12.

[57] PG&E Comments, p. 4.

Chargepoint requests amending the definition of primary meter by replacing "the premises" with "the Customer's account" since a customer premise may have more than one primary meter.

SDG&E requests that the definition of premises, which along with "account" are defined with in Rule 1, remain unchanged.[58] SDG&E explains that an IOU may commonly have an Electric Meter at a Service Point for an Account at a Customer Premises (which may have multiple Service Points). SDG&E asserts that the key issue is defining "the *primary IOU meter* location for subtractive billing" (emphasis added). We agree with SDG&E. We reference the Applicability section Schedule PEVSP to clarify that in the case of a premises with multiple primary meters that submetered PEV usage shall only be subtracted from the usage registered by the primary meter to which it is connected. No changes to the definition are necessary.

(l) Reference to "Summary Bill" at page 5

Chargepoint requests amending the definition of Submeter Billed Amount by replacing "Summary Bill" with "summary of charges related to submetered usage."

SDG&E requests that the definition of Summary Bill, which as defined in Rule 1 refers to a customer statement that displays charges for two or more service accounts, remain unchanged because the Summary Bill may contain charges for accounts not participating in the Pilot.[59] Given this additional context, SDG&E's request to maintain the existing definition of "Summary Bill" is reasonable. No changes to the definition are necessary.

2. ***Customer Enrollment Agreement***

As ordered in OP 2, of D.13-11-002, the IOUs included a Customer Enrollment Agreement. The Commission considers parties' protests to the following terms in the Submeter MDMA Registration Agreement. Parties protested eight items related to the customer enrollment form: (a) Description of survey/testing at

[58] SDG&E Comments, p. 4.

[59] SDG&E Comments, p. 4.

page 1; (b) Description of installation at page 2; (c) Description of participating responsibilities at page 2; (d) Description of disregarded information at page 3; (e) Ineligibility for other IOU programs at page 4; (f) Reference to IOU website at page 4; (g) Customer Enrollment Agreement Instructions at page 1; and (h) IOU Assistance in Customer Recruitment.

(a) Description of Survey/Testing at page 1

Chargepoint requested additional language to describe in detail the customer's potential experience during survey testing. They asked that the following language (in bold) be added to the Paragraph 5 of Section A:

> "…In addition, you agree to provide an independent evaluator paid by the Investor owned Utilities (IOUs) with feedback on your experiences with Pilot participation, including enrollment, equipment installation, and billing. **In accordance with the CPUC's instruction, this survey will not be burdensome.** Additionally, you may be required to provide access to your home or facility for the evaluator to perform tests on your submeter. **Such submeter testing is only required of 5% of participating customers. If your submeter is selected for testing, tests will be arranged at a convenient time, and your MDMA may be present**…."[60]

The proposed language is consistent with the structure of the pilot evaluation as described in the Decision.

<u>The IOUs shall include Chargepoint's suggested language to describe the customer's experience during survey testing.</u>

(b) Description of Installation at page 2

Chargepoint requested that the participant be obliged to install or "have installed" a submeter to reflect a subcontractor situation. We find that the utility language on this point is intended to indicate that the customer is responsible for the installation of the submeter, and is not intended to indicate that the customer must do it themselves. Chargepoint's proposed language is consistent with the Decision.

[60] Chargepoint Protest, p. 10-11.

The IOUs shall revise the references to submeter installation to reflect the possibility of a subcontracted installation.

(c) Description of Participant responsibilities at page 2

ORA protests that this term gives the customer, in addition to its Submeter MDMA, responsibility for installation and maintenance. They assert that the term is inconsistent with the Decision that states that the Submeter MDMA would have this responsibility.[61] The Agreement's proposed term is consistent with the Decision, which was crafted assuming that the Submeter MDMA may be able to act on behalf of the customer, according to responsibilities established in their customer/MDMA contract. This protest is dismissed.

(d) Description of disregarded information at page 3

Chargepoint requested clarification regarding termination such that incomplete or late data be disregarded only in cases where the MDMA's action is cause of the data transmission failure. Chargepoint's language is consistent with the Decision.

The IOUs shall clarify that termination due to late or incomplete data only occur in cases where the MDMA's action is the cause of the data transmission failure.

(e) Ineligibility for other IOU programs at page 4

ORA protests that prohibiting customers from participating in other programs that might encourage energy savings such as My Account, Green Button, Budget Assistant, Peak Time Rebate, and Rate Analyzer may discourage them from participating in the submetering pilot. The IOUs' reply focuses on the Level Pay Plan and Direct Pay Plan and does not address the programs previously listed. The IOUs shall allow participation with the other programs because although PEV load accounted by the submeter and associated costs from the PEV time of use rate, the primary meter still will reflect a utility-grade accounting of the customer's total usage.

[61] D.13-11-002, p. 33.

In comments to the Draft Resolution, the IOUs modify their proposal to no longer restrict pilot participant access to online tools.[62] They clarify that while these will be available to participants, because submeter data is not required to be presented online and is only received monthly, analyses completed with these tools will be inaccurate. IOUs also clarify that submeter data will not be used for programs that require the use of Smart Meter data, including Peak Time Rebate or Rate Analyzer.

The utilities shall refine the term to limit participation only from programs that would prevent the completion of subtractive billing. The IOUs shall include a statement disclaiming the accuracy of these tools used to analyze electricity usage from the billing periods that they are enrolled with subtractive billing that explains that since submeter data will not be used for these programs, resulting analyses may not be accurate.

(f) Reference to IOU website at page 4

Chargepoint requests that the utility remove references to terms on its website. Customers should not be subject to searching the utilities' websites in order to determine their participation in the pilot. However, the IOU website is a useful resource for customers needing to access other relevant tariff information. While the tariff should not direct customers to their website to determine pilot eligibility, the utility may direct pilot participants to their website for broad information relevant to customer accounts and other programs.

The IOUs shall revise the terms to remove the suggestion that customers search the IOU website to determine their eligibility to participate in the pilot.

(g) Customer Enrollment Agreement Instructions at page 1

Chargepoint requests the revision of Steps 2-4 of the Customer Enrollment Agreement Instructions to correctly reflect the pilot process. In particular, they ask that the language reflect that the MDMA is responsible for enrolling customers, that customers need not call the IOU to enroll and that EVSE installation will be unnecessary for customers that already have EVSE installed. Chargepoint's recommendations are consistent with Decision13-11-002.

[62] PG&E Comments, p. 4; SCE Comments, p. 4.; SDG&E Comments, p. 4.

The IOUs shall revise the terms to reflect the most likely expected processes for enrolling customers.

(h) IOU Assistance in Customer Recruitment

Glen Canyon and ORA suggested that the IOUs provide the MDMAs assistance in identifying customers to participate in the pilot. The IOUs did not reply to this suggestion. The Decision did not intend for the IOUs to actively participate in customer acquisition and prior to customer enrollment.[63] However, we are compelled by the potential of this recommendation to reduce costs and improve participation.

Glen Canyon comments that the optionality granted to the IOUs in assisting with customer recruitment is unsuitable for their participation and suggests that the Commission coordinate the use of other PEV data collection efforts.[64] There is clear interest in leveraging utility data to aid in customer recruitment, however IOUs are restricted from certain uses of confidential PEV customer data that they can access.[65] The option intends for the IOUs to operate permissibly within restrictions designed foremost to protect customer rights to confidentiality and privacy.

The IOU may elect to provide non-discriminatory assistance to MDMAs in order to identify PEV customers under two conditions: (1) The IOU maintains its existing obligations to protect customer privacy; and (2) The costs associated with identifying and transmitting this information to MDMAs are de minimis.

3. *Submeter MDMA Registration Agreement*

As ordered in OP 2, of D.13-11-002, the IOUs included a Submeter MDMA Registration Agreement. The Commission considers parties' protests to the following terms in the Submeter MDMA Registration Agreement. Parties protested five items in the registration form: (a) IOU or Energy Division standards at page 2; (b) Energy Division delegation of review at page 3; (c) Daily

[63] D.13-11-002 Attachment 1, p. 12.

[64] Glen Canyon Comments, p. 2.

[65] See for example California Vehicle Code Sections 1808.23 (a)(4)(C) and (a)(4)(D)

reporting at page 4; (d) Submeter testing and calibration at page 4; (e) MDMA release of utility liability at page 4.

(a) IOU or Energy Division Standards at page 2

Chargepoint requests that Submeter MDMAs be held to compliance with "Energy Division" standards for experience, education, and training, instead of "IOU standards." This request is reasonable given that the Notice of Intent and Notice to Participate from Submeter MDMAs are subject to Energy Division review.[66]

<u>The IOUs shall replace "IOU standards" to indicate that the performance standards are "Energy Division standards."</u>

(b) Energy Division delegation of review at page 3

Chargepoint requests that the Energy Division does not delegate review of the Submeter MDMA registration application to the IOUs to ensure consistency of review. While the Registration Agreement allows for this option, it does not require Energy Division to do so.

SDG&E recommends that if Energy Division maintains this review, MDMAs should be required to also notify the Energy Division it the MDMA terminates their provision of submetering services, so that Energy Division, in turn, can notify the IOUs.[67]

<u>The IOUs shall indicate that Energy Division will review the applications to maintain impartiality and consistency for MDMAs operating in multiple IOU territories, and consult with the IOUs if necessary. The IOUs shall amend this term to state that MDMAs must notify Energy Division and all IOUs in which they are providing services in the event that they terminate service prior to the end of the Pilot Term.</u>

(c) Daily reporting at page 4

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[66] D.13-11-002, p. 28 and Attachment 1, p. 14.

[67] SDG&E Comments, p. 5.

Chargepoint asserts that the daily reporting of pilot participants is burdensome and requests its elimination from the Enrollment Reporting requirement. The Decision required daily reporting during the Open Period (but not during the Exclusivity Period) in order to ensure that Submeter MDMAs could enroll as many customers in excess of the number that they had Exclusivity Rights to, while minimizing the potential for rejecting a customer from the pilot if they turned out to be the 501st submeter customer.[68] The IOUs' implementation of this daily reporting requirement is reasonable and no changes to the Agreement are necessary.

(d) Submeter testing and calibration at page 4

Chargepoint asserts that the Submeter MDMAs should not be required to provide compliance and testing data to the IOUs if they have otherwise complied with the application process and demonstrating consistency with the Performance Standards for Metering and MDMAs. Similar to conditions for Meter System Testing, this term is consistent with the Decision, which requires that Submeter MDMAs propose "methodologies and results for submeter testing and calibration" for IOU review.[69]

Chargepoint requests that MDMAs should not be "required to obtain access from their participants" for testing and calibration because the customer and the utility have a contract that includes this requirement. Chargepoint is referring to the last paragraph of Section A of the Customer Enrollment Agreement.[70] A customer's permission of MDMA access to their submeter is prerequisite in the Customer Enrollment Agreement. However, the Decision requires that "a member of the Submeter MDMA [be] present" during field testing if the submeter is selected.[71] The MDMA's presence during testing by the third party evaluator will be necessary to gain access to the customer's submeter and will ensure that technical questions will be answered.

The IOUs shall clarify the requirement as follows: By virtue of a customer's enrollment with submeter service by the IOU, the Independent Evaluator and

[68] D.13-11-002, p. 29-30.

[69] D.13-11-002, p. 33 and Attachment 1, p. 18.

[70] Customer Enrollment Agreement – Electric Vehicle Submetering Pilot (Phase 1), p. 1.

[71] Id.

Submeter MDMAs may obtain access from their participants for testing and calibration, if selected as part of the evaluation.

The IOUs shall clarify the testing and calibration requirements of MDMAs to maintain consistency with the terms of Customer Enrollment Agreement.

(e) MDMA release of utility liability at page 4

The IOUs included the following release of liability language on page 4 of the Customer Enrollment form: ""I (Submeter MDMA), hereby release, hold harmless, and indemnify the Utility from any liability, claims, demand, causes of action, damages, or expenses resulting from the use of customer information obtained pursuant to this authorization and from the taking of any action pursuant to this authorization, including rate changes." Chargepoint requests clarification that the action of an MDMA releasing the utility from liability be qualified with the following language added to the end of the sentence above: "…provided such Utility action is consistent with applicable CPUC orders, tariffs and regulations." Chargepoint's language adds more clarity to the meaning of this requirement.

The IOUs shall add Chargepoint's suggested modification to the language of the utility release of liability.

4. *Performance Standards for Metering and Meter Data Management Agents*

As ordered in OP 2, of D.13-11-002, the IOUs included Performance Standards for Metering and Meter Data Management Agents, which are based largely on requirements submitted to them by Energy Division. These are included as Attachment 1 to the Submeter MDMA Registration Agreement. The Commission considers parties' protests to the following terms in the Performance Standards for Metering and MDMAs. Parties protested the following three items related to metering requirements: (a) transfer testing at page 11; (b) process updates at page 12; and (c) metering system testing at page 13.

(a) Transfer testing at page 11

Chargepoint requests clarification that transfer "testing" occurs at the initiation of the pilot and "as necessary" thereafter. This request is consistent with the

IOUs' proposed "Registration Process" that requires submission of the formatted data file to pass a data qualification test prior to the start of the pilot.[72]

The IOUs shall clarify that transfer testing occur during the Submeter MDMA Registration Process and thereafter as necessary.

(b) Process Updates at page 12

Chargepoint argues that the IOUs should not have discretion to make "periodic changes" to the format of the metering data communication requirements unless they are justified, and only to the extent that the changes address clear problems. The IOUs are discouraged from periodically modifying the data format for the Minimal Transfer Requirement. The IOUs and MDMAs shall consult with Energy Division prior to implementing any changes to the Minimal Transfer Requirement, which must improve the efficiency of data reporting between the IOUs and MDMAs to warrant modification. However, since utilities were encouraged to develop and offer an Alternative Transfer Option that leverages existing standards[73], it is reasonable to allow for periodic changes to the data format. No changes to the term are necessary.

(c) Meter System Testing at page 13

Chargepoint requests two modifications to this term. First, Chargepoint recommends that the third party evaluator's (3PE) testing requirements be "subject to oversight by the Energy Division." Per the Decision, Energy Division is already required to advise the 3PE per quarterly consultations.[74] In this regard, no changes are necessary.

Second, Chargepoint requests that all interested parties be invited to participate in the development of these requirements to avoid technical issues and disputes. The Decision requires that Submeter MDMAs propose methodologies for testing and calibration for IOU review, consent, and subsequent implementation by the 3PE.[75] Chargepoint's request is consistent with the Decision.

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[72] EV Submeter Pilot Phase 1, Submeter MDMA Registration Agreement, p. 3.

[73] D.13-11-002, p. 31.

[74] D.13-11-002, p. 38.

[75] D.13-11-002, p. 33.

The IOUs shall change the meter system testing term to reflect that the Submeter MDMAs will propose methodologies for testing and calibration for IOU review, consent, and subsequent implementation.

Chargepoint asserts that the "Submeter Manufacturer Certification and Accuracy" section is inconsistent with the Decision, which only requires 1) MDMA confirmation that it meets Energy Division's standards and requirements and 2) third party evaluator testing. As described above, the Decision requires that the Submeter MDMAs propose "methodologies and results for submeter testing and calibration" for IOU review.[76] Consistent with the Decision, the IOUs will review the MDMAs' methodologies for submeter testing and calibration.

The IOUs shall review the MDMAs' proposals to test and calibrate submeters as required by D.13-11-002.

5. *Data Reporting and Transfer Requirements*

As ordered in OP 2, of D.13-11-002, the IOUs included a data format template for transmitting data between the IOUs and MDMAs. These requirements are included in Attachment 2 to the Submeter MDMA Registration Agreement, Data Reporting and Transfer Requirements. It includes basic information needed for the utility to identify the account and submeter energy usage. No protests were received on the data format template. The proposed form is consistent with the requirements of the Decision.

SDG&E states that the IOUs worked with the MDMAs to revise the Data Reporting and Transfer Requirements.[77] A final version, "EV Submetering Pilot Phase 1 Submeter Data Management Agent Registration Agreement version 13.0 Attachment 1" was appended to SDG&E's comments (see Attachment 1).

The revised Data Reporting and Transfer Requirements are consistent with D.13-11-002 and shall be incorporated with the IOUs' compliance filing.

6. *Preliminary Pilot Program Budget for each IOU*

[76] D.13-11-002, p. 33 and Attachment 1, p. 18.

[77] SDG&E Comments, p. 4.

As ordered in OP 3 of D.13-11-002, the IOUs included a Preliminary Pilot Program Budget for each IOU. The Commission considers parties' protests as they relate to the budget. (a) Estimation of Preliminary Budget; (b) Compensation of Non-Recurring and Recurring Costs for Submeter MDMAs; (c) Non-Compensation Terms Affecting Submeter MDMAs; and (d) Availability of Commercial PEV Rates.

(a) Estimation of Preliminary Budget

Protests related to utility pilot budgets focused on the overall funding level in the budgets and the incentive payment levels. We share GPI's concern that the overall budget level appears high. In particular, the customer evaluation expense seems large. In aggregate, the utilities are proposing spending $3 million for an evaluator that will be evaluating a maximum of 3,000 customers and utility expenses associated with submetering. Previous metering pilots have required various budgets. For example on the lower end, the evaluation for a solar water heating pilot program across 342 customers testing 38 meters over three years in SDG&E's territory required a budget of $429,320. For comparison, while the maximum number of customers in the submetering pilot is 3,000, field tests are required only for up to 5% (150) of total meters participating.[78] The Draft Resolution proposed to reduce the 3PE budget to 1 million based on the scale of this SDG&E pilot.

PG&E disagrees with the reduction in the allocation for the Third Party Evaluator.[79] PG&E favors maintaining the budget because 1) $3 million is contemplated to fund both Phases 1 and 2; 2) the reduced funding would be inadequate to fund a survey of 3,000 submeters and disproportionate to funds allocated for the solar water heating survey; and 3) the submetering pilot spans three IOU service territories, not just SDG&E's. PG&E offers that the statewide CSI Metering Project evaluation of 520 meters over 7 years costing $3.6 million is comparable in scope to the Pilot. PG&E asserts that $3 million is warranted given the scope of the evaluation and autonomy granted to the 3PE, and suggests that scope may be reduced if necessary.

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[78] D.13-11-002, p. 33. The Decision directs the 3PE to "report on the accuracy and functionality of a statistically significant number of submeters."

[79] PG&E Comments, p. 2

The Draft erred in its interpretation of the scope of the pilot and we are compelled to increase the 3PE allocation to fund the evaluation of Phases 1 and 2. It is difficult to definitively compare the evaluation requirements of different meter pilots. Toward this point, we note that the evaluation budget per meter for the solar water heating pilot was ~1.6 times that of the CSI pilot. We highlight that the Decision defines a maximum, not a minimum, number of submeters for field testing, and does not necessarily require additional post-facto testing. The Decision tasks the Energy Division with oversight of the 3PE activities. Mandated quarterly consultations between the 3PE and Energy Division will enable Energy Division to provide advisory input to the design of the evaluation based on participation levels and costs associated with 3PE survey activities. Increasing the funding amount to $2 million total across the utilities reflects a reasonable evaluation cost per meter and provides additional funding for the 3PE to complete its other obligations.

<u>The IOUs shall reduce the budget for the Third Party Evaluator by $1 Million to $2,000,000 in aggregate across all three utilities.</u>

PG&E, SDG&E, and GPI/CEC request clarification of the budgeted amounts that differed from Attachment B to the Advice Letter that are listed on the Estimated Costs section of the Draft Resolution.[80] In Attachment 3, Energy Division analysis details the costs associated with the major elements of the IOUs' budget that were submitted in the Advice Letter, proposed to be changed in the Draft Resolution, and adopted in the Final Resolution. For the Draft and Final Resolutions, Energy Division analyzed the impacts on total costs from two potential levels of commercial customer participation (50% and 100% of total participants), the two considered NEM customer caps (where NEM customers fully subscribed at 10% and 20% of total participants), and the allocation to the 3PE budget ($1 or $3 Million (M) total).

The budgets identified in the "Estimated Costs" sections of the Resolutions are tabulated in Column G within Attachment 3. The costs identified in the Draft Resolution reflected a scenario where $2M of 3PE budget offset increases in the customer incentives and payments that substitute for PEV rates to commercial customers (half of total participants in PG&E and SDG&E). The costs identified

[80] PG&E Comments, p. 3, SDG&E Comments, p. 2, and GPI/CEC Comments, p. 6.

in the Final Resolution reflect a scenario where $1M of 3PE budget offset smaller increases in customer incentives, the maximum amount of payments to commercial customers (accounting for all permitted participants in PG&E and SDG&E), and the maximum additional costs from NEM (meeting the 20% cap in all territories) but only incurring additional billing costs in SCE and PG&E. The latter case estimates a maximum potential cost given the permitted modifications to the Tariff and budget terms in this Resolution.

SDG&E requests cost recovery for the Pilot expenses or authority to open a balancing account or memorandum account for pilot. The Commission modified the proposed D.13-11-002 to accept SDG&E's request for authorization for a memorandum account. Subsequently, Energy Division approved SCE and SDG&E's Submeter Memorandum Accounts.[81]

<u>The Commission has previously authorized SDG&E and SCE's requests to establish Memorandum Accounts for the Submetering Pilot.</u>

(b) Compensation of Non-Recurring and Recurring Costs for Submeter MDMAs

Chargepoint protested in favor of higher third party compensation, asserting that the payment level proposed by the IOUs does not fully cover their non-recurring cost to participate. While Glen Canyon stated in its protest that it considered the IOU proposal for per-customer payments "fair and reasonable," it disagreed with the Draft Resolution's lack of "assurance of payment" while participating.[82] In reply, the IOUs argued that there was "no established benefit to ratepayers," suggesting that MDMAs' fixed costs were not justified for compensation. If there were 'established benefits' to submetering, there would be no need to conduct pilots. Decision 13-11-002 identified several potential benefits from this pilot project. It is unclear how the Commission can evaluate these benefits without ensuring that third parties can participate in the pilot. Like other EPIC projects, this requires some method to pay third party costs that cannot reasonably be expected to generate revenue. We agree with Chargepoint and Glen Canyon that compensation is necessary. Additionally, this pilot may benefit non-participating

[81] D.13-11-002, p. 42; SCE AL 2985-E effective December 11, 2013; SDG&E AL 2584-E effective March 14, 2014.

[82] Glen Canyon Comments, p. 1.

entities, including future customers and MDMAs, further justifying the inclusion of fixed costs in third-party compensation.

However, we also agree with the utilities that paying for the fixed costs of MDMAs without using a competitive bidding mechanism, could result in "selective funding." Lacking an effective and timely way to evaluate third-party fixed costs, we are compelled to use the upfront incentive payment as a means to help defray all types of third-party costs associated with participating in this pilot.

The IOUs' budget proposes providing MDMAs with a $200 customer acquisition payment and a $10 monthly participation payment. ORA argued that the payment should be split between the customer and the MDMA. We agree that there are benefits to allocating more of the incentive to be paid on a monthly basis, as it reduces the incentive for MDMAs to drop out before the pilot is complete.

SCE disagreed with the Draft's increased incentive payment to the MDMAs.[83] Implementing the Pilot consistent with the Goals and Guiding Principles set forth in the Decision has been constrained by the specific types of MDMA activities that are authorized.[84] In order to fairly compensate Submeter MDMAs on a "per customer" basis, enable greater participation by NEM customers, and sufficiently fund the 3PE— while also maintaining cost— it is necessary and reasonable to reduce the incentive payments from levels proposed in the Draft. We are persuaded that an enrollment incentive set higher than the IOU proposal that is balanced by the monthly incentive can encourage both customer enrollment and adequate MDMA performance.

<u>The IOUs shall use $1 Million of the $3 Million previously allocated to the Third Party Evaluator to, in part, provide the Submeter MDMA a one-time enrollment payment of no less than $210 per customer and a $17.50 per month payment for performing submetering data management and exchange responsibilities.</u>

(c) Non-Compensation Terms Affecting Submeter MDMAs

[83] SCE Comments, p. 2.

[84] D.13-11-002, p. 40-41.

The IOUs currently propose to pay the enrollment incentive within 60 days after each customer enrollment and to pay the monthly fee within 60 days after the end of each quarter.[85] Chargepoint argued that this is excessively long, resulting in high carrying costs for participants. ORA commented that payments should be made after three successful billing cycles for all participants enrolled to incentivize the MDMA to provide timely and accurate service. The Commission agrees with the IOUs that it is reasonable to pay the enrollment incentive within 60 days after the enrollment. However, we are compelled by the need to ensure that ratepayer funds only compensate MDMAs that appropriately complete their responsibilities. The IOUs shall pay the MDMAs the monthly incentive payment within 60 days of the first two successful billing cycles for a given customer, and within 30 days after successful billing cycles thereafter. The 60-day period will also allow the utility to verify that the participating MDMA is providing MDMA services while accommodating the needs for participating MDMAs.

<u>The IOUs shall revise the terms to reflect the 60- and 30-day deadlines by which MDMAs must receive payment to ensure that the MDMAs are compensated for adequate performance.</u>

With respect to the adequacy of business terms or the need for a separate agreement between an MDMA and an IOU, we find that the IOU submission of Schedule PEVSP and its associated agreements are consistent with the requirements of the Decision.[86] Ordering Paragraph 2 of the Decision mandated the creation of five documents integral to Pilot execution, which complemented by Schedule PEVSP, comprise a coherent agreement establishing terms and conditions for a customer's, MDMA's, and IOU's obligations for the Submetering Pilot. We concur with the IOUs that Schedule PEVSP comprises an open access tariff that establishes the requirements needed for non-discriminatory participation. Schedule PEVSP, the Customer Enrollment Agreement and Submeter MDMA Registration Agreement (and its attachments) constitute the arrangement necessary to define parties' operations during the Pilot.

<u>The IOUs shall define, as necessary, and complete references among the five documents mandated in Ordering Paragraph 2 of D.13-11-002 and Schedule</u>

[85] Joint IOU Advice Letter, p. 5.

[86] D.13-11-002, p. 35.

PEVSP in their subsequent Tier 1 Advice Letter to ensure the cohesiveness of the tariff and agreements.

(d) Availability of Commercial PEV Rates

Chargepoint identified the need to address rate design issues given that PG&E and SDG&E currently lack PEV-specific commercial rates to apply to submetered energy use. Since rate design is not in the scope of the pilots and is pending in concurrent proceedings, we will not require PG&E and SDG&E to develop commercial PEV rates for this pilot. Absent rate designs for PG&E and SDG&E's commercial customers, the IOUs were amenable to providing a flat payment of $20/month per submeter that could expediently be applied to bills. We consider the maximum potential total cost associated with this payment to be reasonable in comparison to the budget requirements for the remainder of the phase 1 pilot.

PG&E and SDG&E shall revise the Customer Enrollment Agreement and Schedule PEVSP to include a flat $20/month payment for customers on commercial time-of-use tariffs.

7. Pilot Evaluation Process Timeline

As ordered in OP 6, of D.13-11-002, the IOUs included a timeline for the submetering pilot program evaluation process. No parties protested the timeline, entitled Planning Details for Selection of EV Pilot Third Party Evaluator.

The Pilot Evaluation Process Timeline is reasonable given the requirements of D.13-11-002.

Consistency with the Zero-Emission Vehicles Action Plan

Executive Order B-16-2012 set forth targets for the commercialization of zero-emission vehicles ("ZEV") to reduce emissions from the transportation sector by 80% by 2050. The ZEV Action Plan identifies specific strategies and actions that the state agencies will take to meet the milestones of B-16-2012. The Action Plan sets four broad goals to advance ZEVs, which include:

(1) Complete needed infrastructure and planning,

(2) Expand consumer awareness and demand,

(3) Transform fleets, and

(4) Grow jobs and investment in the private sector.

The under the second goal, the Action Plan identifies the CPUC as the lead agency to implement certain activities related to submetering. Specifically, the Action Plan requires the CPUC to:

> Evaluate ways to reduce costs of PEV home charging, including creating a simpler metering option for homes with PEV chargers and establishing a sub-metering protocol or other policies to reduce costs for homeowners to access PEV-specific time of use rates.[87]

Consistent with the Zero Emission Vehicles Action Plan, the submetering pilots ordered in D.13-11-002 tasks the IOUs and Submetering MDMAs to evaluate the use of submetering to reduce PEV charging and equipment costs by enabling access to customer-owned submeters and PEV-specific time of use rates.

Public Safety

California Public Utilities Code Section 451 requires that every public utility maintain adequate, efficient, just, and reasonable service, instrumentalities, equipment and facilities to ensure the safety, health, and comfort of the public.

Schedule PEVSP Pilot requires that submeters meet Underwriters Laboratory ("UL") safety requirements. All submeters used in the pilot, whether it is included as part of a device (such as an Electric Vehicle Supply Equipment) or is a stand-alone device are subject to this safety requirement.[88]

Based on the information before us, this tariff does not appear to result in any adverse safety impacts on the facilities or operations of the IOUs.

COMMENTS

Public Utilities Code section 311(g)(1) provides that this resolution must be served on all parties and subject to at least 30 days public review and comment prior to a vote of the Commission. Section 311(g)(2) provides that this 30-day period may be reduced or waived upon the stipulation of all parties in the proceeding.

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[87] Office of Governor Edmund G. Brown, *2013 ZEV Action Plan: A Roadmap toward 1.5 Million Zero-emission Vehicles on California Roadways by 2025*, p. 16.

[88] Performance Standards for Metering and Meter Data Management Agents, Section 1.C.

The 30-day comment period for the draft of this resolution was neither waived nor reduced. Accordingly, this draft resolution was mailed to parties for comments on April 21, 2014. PG&E, SCE, SDG&E, GPI/CEC, and Glen Canyon submitted timely comments by May 12, 2014. The IOUs concur with comments filed by the other IOUs. Comments related to terms of the Tariff and agreements discussed within the Draft were considered and addressed in their appropriate sections within the Discussion of this Resolution. Issues that required substantive change are numbered below. Other modifications to terms of the Tariff or agreements are non-substantive.

1. Unbundled Customer Eligibility
2. NEM Account Cap
3. Ineligibility for Direct Pay Plan and Level Pay Plan
4. Ineligibility for other IOU programs
5. Estimation of Preliminary Budget
6. Compensation of Non-Recurring and Recurring Costs for Submeter MDMAs

Comments on issues that were not previously discussed in the Draft are detailed below.

Direct Metering for the Low Carbon Fuel Standard

Glen Canyon requests clarification of the status and eligibility for submeters to be used to record electricity use for the purposes of generating credits eligible for compliance obligations under the Low Carbon Fuel Standard (LCFS).[89] This comment is tangentially relevant to submetering issues within R.13-11-007 and LCFS issues within R.11-03-012 but primarily requests direction on requirements for metering and credit accrual defined in the LCFS program regulation set by the California Air Resources Board.[90] Comments regarding the ARB Low Carbon Fuel Standard regulations are out of scope of this informal proceeding.

[89] Glen Canyon Comments, p. 2.

[90] Section 95484(b)(3)(C)1.a. of the Low Carbon Fuel Standard requires the use of direct metering in residential charging stations. Section 95484(a)(6)(A) identifies that the Electric Distribution Utility supplying electricity for transportation fuel supplied through EV charging equipment in a single or multi-family residence may opt-in as the regulated party in their service territory.

Permitted Levels of Charging Power

Glen Canyon requested clarification that all levels of charging be eligible for submetering.[91] D.13-11-002 nor Schedule PEVSP do not differentiate or exclude PEV loads based on type of charging power measured by a submeter.

Compliance Filing Modifications to Tariff and Agreements

SCE requests authority to modify Schedule PEVSP and the associated agreements to make additional modifications related to: implementation directions provided in the final resolution, utility-specific terms or program names, or typographical errors.[92]

The IOUs are permitted to modify Schedule PEVSP and the associated agreements related to implementation terms as directed in the final resolution, utility-specific terms or program names, or typographical errors, or those consistent with the requirements of D.13-11-002 for approval in their Tier 1 filing.

Energy Division Phase 1 Preparatory Workshop

The IOUs also suggested that Energy Division conduct a workshop to discuss with participating MDMAs the requirements of the Pilot prior to launch.[93] Energy Division will hold a workshop to clarify participant roles and procedures as soon as practicable subsequent to the IOUs' submission of compliance filings and the Submeter MDMAs declare their intent to participate.

Modification to Pilot Schedule

On March 20, 2014 SDG&E, on behalf of SCE and PG&E, submitted a letter to the Commission's Executive Director that requested an extension of time of the April 1 and May 1 milestones that, respectively, required MDMAs to declare their intent to participate and for the MDMAs and IOUs to begin Phase 1 enrollment. These milestones were not met due to Energy Division's pending review of the

[91] Glen Canyon Comments, p. 3.

[92] SCE Comments, p. 4.

[93] SCE Comments, p. 5; SDG&E Comments, p. 5.

Advice Letters. The extension requested to revise the deadlines to 15 and 45 days contingent upon the final approval of the Resolution. On April 7, the Executive Director approved this request. In comments, SDG&E identified the need to update the Pilot Timeline on pages 22-23 of the Submetering Roadmap to conform with the directives of D.13-11-002 given this delay in launching the Pilot.[94] To this end, SDG&E details a sequence of events that we find to reasonably request amendments to the deadline to facilitate Pilot development. In Attachment 2, we define contingent (as opposed to established or defined) dates that are more amenable to and can account for learning curves and additional identified action items during implementation or potential regulatory delay.

The Submetering Roadmap's Pilot Timeline shall reflect the modifications identified in Attachment 2 to facilitate Pilot development and implementation.

Energy Division also completed minor typographical corrections.

FINDINGS AND CONCLUSIONS

1. Southern California Edison Company ("SCE"), Pacific Gas and Electric Company ("PG&E"), and San Diego Gas and Electric Company ("SDG&E") respectively filed Advice Letter ("AL") 42343-E, 2993-E, and 2566-E on January 21, 2014, in which it requested approval of Schedule PEVSP to implement pilots to demonstrate Plug-In Electric Vehicle Submetering. The Joint Advice Letter received four timely protests from ChargePoint, Glen Canyon, Green Power Institute/Community Environmental Council (GPI/CEC), and Marin Clean Energy. The Joint Advice Letter received a response from the Office of Ratepayer Advocates. Protests and responses were timely filed on February 10, 2014. The Joint Investor Owned Utilities and PG&E filed a timely reply on February 18, 2014. The Draft Resolution received timely comments from SCE, PG&E, SDG&E, Glen Canyon, and GPI/CEC.

2. Schedule PEVSP requires the following modifications to conform to the requirements of D.13-11-002. The IOUs shall:
   i. Allow participation by Community Choice Aggregator customers.

[94] SDG&E Comments, p. 2.

ii. Work with a CCA intending to determine a separate billing procedure to accommodate generation-specific PEV load necessary to accommodate MDMAs serving CCA customers.

iii. Notify the customer if submetering service is terminated and allow them to complete the remainder of their Pilot Participation Period subject to completing the requirements to re-enroll with an alternative provider.

iv. Based on more recent adoption levels and in order to contain costs, reduce the limit on NEM customer participation to 20% (300) of total eligible submeters for Phase 1 of the Pilot.

v. Correct the length of the Enrollment Period to 6 months page 3.

vi. Allow 10 days for an MDMA to report a drop-out or change of address, and include the following options that allow customers who change their address to continue in the pilot:

a) For customers among the first 500 within a service territory that relocate within the service territory: 1) their MDMA must submit a separate Customer Enrollment Form for their new service address at least five days before the end of the current billing period; and 2) they are eligible to reenroll in the Pilot after the Enrollment Period.

b) For customers that relocate to another IOU's service territory, they may reenroll if the IOU's 500 submeter limit has not been met.

vii. Extend pilot eligibility to Direct Pay Plan and Level Pay Plan customers if their submeter service does not involve remitting payments to be credited against their account. Customers currently enrolled with Direct Pay Plan and Level Pay Plan are eligible to participate in the pilot, but must unenroll from the programs for the duration of the pilot.

viii. Eliminate limit 19 submeters per primary meter and restrict participants from using multiple levels of submeters.

ix. The IOUs collaborated with the MDMAs to determine that validating, editing, and estimating interval data is not required for Single Customer of Record submetering, as required by D.13-11-002. The IOUs will revise VEE terms to complete Multiple Customer of Record submetering.

3. The Customer Enrollment Agreement requires modifications to conform to the requirements of D.13-11-002. The IOUs shall:

i. Include Chargepoint's suggested language to describe the customer's experience during survey testing by adding the following bolded language

to the description of the survey experience: "…In addition, you agree to provide an independent evaluator paid by the Investor owned Utilities (IOUs) with feedback on your experiences with Pilot participation, including enrollment, equipment installation, and billing. **In accordance with the CPUC's instruction, this survey will not be burdensome.** Additionally, you may be required to provide access to your home or facility for the evaluator to perform tests on your submeter. **Such submeter testing is only required of 5% of participating customers. If your submeter is selected for testing, tests will be arranged at a convenient time, and your MDMA may be present**…."

ii. Revise the references on page 2 to submeter installation to allow for the possibility of a subcontracted installation.

iii. Change page 3 to allow termination due to late or incomplete data to only occur in cases where the MDMA's action is the cause of the data transmission failure.

iv. Change the eligibility terms on page 4 to limit pilot participation only in cases where customers are participating in utility programs that would prevent the completion of subtractive billing. The IOUs shall include a statement disclaiming the accuracy of these tools used to analyze electricity usage from the billing periods that they are enrolled with subtractive billing that explains that since submeter data will not be used for these programs, resulting analyses may not be accurate.

v. Revise page 4 to remove the suggestion that customers search the IOU website to determine their participation in the pilot.

vi. Revise steps 2-4 of the enrollment process to correctly reflect that the MDMA is responsible for enrolling customers, that customers need not call the IOU to enroll and that EVSE installation will be unnecessary for customers that already have EVSE installed. Chargepoint's recommendations are consistent with Decision 13-11-002.

vii. The IOU may elect to provide non-discriminatory assistance to MDMAs in order to identify PEV customers under two conditions: (1) The IOU maintains its existing obligations to protect customer privacy; and (2) The costs associated with identifying and transmitting this information to MDMAs are de minimis.

4. The Submeter MDMA Registration Agreement requires modifications to conform to the requirements of D.13-11-002. The IOUs shall:
   i. Replace "IOU standards" on page 2 to indicate that the performance standards are "Energy Division standards."
   ii. Indicate that Energy Division will review the applications to maintain impartiality and consistency for MDMAs operating in multiple IOU territories, and consult with the IOUs if necessary. The IOUs shall amend this term to state that MDMAs must notify Energy Division and all IOUs in which they are providing services in the event that they terminate service prior to the end of the Pilot Term.
   iii. Change the testing and calibration requirements for MDMAs on page 4 to clarify that the Independent Evaluator and Submetering MDMA may obtain access from their participants for testing and calibration, if selected as part of the evaluation.
   iv. Add Chargepoint's suggested modification to the language of the utility release of liability on page 4, adding following language to the end of the last sentence in the Indemnification section: "…provided such Utility action is consistent with applicable CPUC orders, tariffs and regulations."

5. The Performance Standards for Metering and Meter Data Management Agents require modifications to conform to the requirements of D.13-11-002. The IOUs shall:
   i. Change transfer testing requirements on page 11 to clarify that transfer testing occurs during the Submeter MDMA Registration Process and thereafter as necessary.
   ii. Change the meter system testing term to reflect that the Submeter MDMAs will propose methodologies for testing and calibration for IOU review, consent, and subsequent implementation.
   iii. The IOUs shall review the MDMAs' proposals to test and calibrate submeters as required by D.13-11-002.
   iv. The revised Data Reporting and Transfer Requirements are consistent with D.13-11-002 and shall be incorporated with the IOUs' compliance filing.

6. Schedule PEVSP and other supporting agreements require modifications to conform to the requirements of D.13-11-002 and to reflect changes to the Preliminary Pilot Program Budget for each IOU. The IOUs shall:

i. Reduce the budget for the Third Party Evaluator by $1 Million to $2,000,000 in aggregate across all three utilities.

ii. The Commission has previously authorized SDG&E and SCE's requests to establish Memorandum Accounts for the Submetering Pilot.

iii. Use the $1 Million of the $3 Million previously allocated to the Third Party Evaluator to, in part, provide the Submeter MDMA a one-time enrollment payment of no less than $210 per customer and a $17.50 per month payment for performing submetering data management and exchange responsibilities.

iv. Revise the terms to reflect the 60- and 30-day deadlines by which MDMAs must receive payment to ensure that the MDMAs are compensated for adequate performance.

v. Define, as necessary, and complete references among the five documents mandated in Ordering Paragraph 2 of D.13-11-002 and Schedule PEVSP in their subsequent Tier 1 Advice Letter to ensure the cohesiveness of the tariff and agreements.

vi. PG&E and SDG&E shall revise the Customer Enrollment Agreement and Schedule PEVSP to include a flat $20/month payment for customers on commercial time-of-use tariffs.

7. The Pilot Evaluation Process Timeline is reasonable given the requirements of D.13-11-002.

8. The Submetering Roadmap's Pilot Timeline shall reflect the modifications identified in Attachment 2 to facilitate Pilot development and implementation.

9. Consistent with the Zero Emission Vehicles Action Plan, the submetering pilots ordered in D.13-11-002 tasks the IOUs and Submetering MDMAs to evaluate the use of submetering to reduce PEV charging and equipment costs by enabling access to customer-owned submeters and PEV-specific time of use rates.

10. Based on the information before us, this tariff does not appear to result in any adverse safety impacts on the facilities or operations of the IOUs.

THEREFORE IT IS ORDERED THAT:

1. Southern California Edison Company, Pacific Gas and Electric Company, and San Diego Gas and Electric Company implement the submetering pilots ordered in D.13-11-002 through Schedule Plug-In Electric Vehicle Submetering Pilot and the associated agreements, as modified herein.
2. Southern California Edison Company, Pacific Gas and Electric Company, and San Diego Gas and Electric Company shall file Tier 1 Advice Letters revising Schedule Plug-In Electric Vehicle Submetering Pilot and associated agreements according to: the pilot implementation terms modified herein, or as a result of collaboration with stakeholder and/or Energy Division consistent with the resolution; any utility-specific terminology; or to correct typographical errors within 14 days of the effective date of this resolution.

This Resolution is effective today.

I certify that the foregoing resolution was duly introduced, passed and adopted at a conference of the Public Utilities Commission of the State of California held on June 26, 2014; the following Commissioners voting favorably thereon:

_____
PAUL CLANON
Executive Director

Attachment 1

Request for Extension of Deadlines Established in D.13-11-002 for Declaring Intent to Participate in Submetering Pilot Phase 1 and to begin Phase 1 Open Enrollment

IOU Request to Executive Director from March 20, 2013 and
Executive Director Approval of Request from April 7, 2013
(embedded .PDF)

Revised Submetering Roadmap Pilot Timeline

STATE OF CALIFORNIA EDMUND G. BROWN JR., Governor

PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298

April 7, 2014 File No.: R.09-08-009 and R.13-11-007

Steven Patrick
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Los Angeles, CA 90013-1034

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RE: Request for Extension of Deadlines Established in Decision 13-11-002 for Declaring Intent to Participate in Submetering Pilot Phase 1 and to Begin Phase 1 Open Enrollment

Dear Mr. Patrick:

This letter responds to your March 20, 2014 letter requesting an extension of time to comply with the April 1, 2014 and May 1, 2014 deadlines for implementing submetering pilots included in Decision 13-11-002. Your request for an extension is made on behalf of Southern California Edison Company (SCE), San Diego Gas & Electric Company (SDG&E), and Pacific Gas and Electric Company (PG&E) pursuant to Rule 16.6 of the Commission's Rules of Practice and Procedure.

Decision 13-11-002 requires that the above utilities allow third-party participants to declare their intent to participate in the submetering pilot by April 1. The same Decision requires that the utilities begin the pilot by May 1, 2014. The utilities jointly submitted a Tier 2 advice letter to implement electric vehicle submetering pilots to the Commission by January 21, 2014. Energy Division staff is currently reviewing the advice letter. SCE, SDG&E and PG&E now jointly request an extension to these two deadlines to allow for resolution of the requests in the advice letter. The Commission received no opposition letter to this request.

I recognize the need to extend the deadline due to Energy Division staff's continuing review of the joint utility submetering implementation advice letter. Today's letter continues the extension for the two deadlines mentioned above until 15 and 45 days, respectively, after the Commission has approved the joint utility submetering implementation advice letter.

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Revised Submetering Roadmap Pilot Timeline

Event	Start Date	Completion Date or Max. Calendar Day Duration from Event or Start Date Noted
Submetering Protocol Due (if Authorized by future Decision)	Any time	3 months after 3PE Report Filed
3PE Final Report on Phases 1 & 2	6 months after start of Open Period	1/31/18
Remaining Term of Phase 2 pilot	11/1/16	10/31/17
3PE Phase 2 Report - 3 mo. post Open Period	11/1/16	2/1/17
Ph 2 Enrollment Period- Open	8/1/16	90 days
Ph 2 Enrollment Period- Exclusivity	5/1/16	90 days
IOU/MDMA Prep for "go-live"	CPUC Vote	60 days
MDMA Consider and File Intent to Participate	CPUC Vote	14 days
Submit T1 AL (Phase 2)	CPUC Vote	14 days
Resolution Comment to vote	Comment Deadline	10 days
Resolution Publish to Comments Due	Publish Date	20 days
Resolution E-XXXX Start to Publish	Submission of T2 AL	30 days
Develop and Submit T2 AL (Phase 2)	2 months after 3PE Report	30 days
Phase 2 Workshop	2 months after 3PE Report	7 days
Remaining Term of Phase 1	3/1/15	2/28/16
3PE Interim Report	3/1/15	9/1/15
Enrollment Period- Open	12/1/14	90 days
Enrollment Period- Exclusivity	9/1/14	90 days
IOU/MDMA Prep for "go-live"	Intent to Participate	9/1/14
MDMA Consider and File Intent to Participate	6/26/14	15 days
Submit T1 AL (Phase 1)	6/26/14	14 days
Develop RFP, solicit, & award 3PE	6/26/14	165 days
Preliminary RFP Work	3/1/14	6/26/14
Resolution E-4651 publish to vote	4/15/14	6/26/14
Phase 1 AL Submission to Protest	1/21/14	2/10/14
Submit T2 AL (Phase 1)	11/13/13	1/21/14
Decision 13-11-002		11/14/13

Attachment 2

EV Submeter Pilot Phase 1
Data Reporting and Transfer Requirements

Included as Attachment A to SDG&E's Comments on Draft Resolution E-4651
(embedded .PDF)

Clay Faber
Regulatory Affairs
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CFaber@semprautilities.com

May 12, 2014

Energy Division
Attention: Tariff Unit
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102

Re: Comments of San Diego Gas & Electric on Draft Resolution E-4651

Dear Energy Division Tariff Unit:

San Diego Gas & Electric Company (SDG&E) appreciates the opportunity to comment on Draft Resolution E-4651 (Draft Resolution), issued on April 21, 2014. The Draft Resolution addresses SDG&E's, Southern California Edison's (SCE), Pacific Gas and Electric Company's (PG&E) (collectively referred to as the Investor-Owned Utilities or IOUs) Advice Letters seeking approval of Schedule Plug-In Vehicle Submetering Pilot in compliance with Decision (D.) 13-11-002. The Draft Resolution approves the IOUs' request to proceed with the submetering pilot, with modifications. An overview of SDG&E's Comments is provided in the next section, followed by the discussions of SDG&E's recommendations.

Overview of SDG&E's Comments

SDG&E appreciates the Commission Staff's review of the IOUs' advice letters and efforts related to the implementation of the submetering pilot. However, in these Comments, SDG&E notes that certain aspects of the Draft Resolution should be amended or require clarification. The resolution should clarify the IOU's proposed budgets to reflect the utilities' budget estimates. In addition, SDG&E addresses updating the pilot timeline, availability of online tools and submetering data presentment, updating Data Reporting and Transfer Requirements to be included as part of the Final MDMA Registration Agreement, retention of existing Tariff definition of "Summary Bill" and "Premises", and the requirement for MDMAs to Notify the CPUC of Termination of Pilot Service and schedule revisions.

In addition, SDG&E and the other IOUs have collaborated regarding the Draft Resolution and agree on the identification of a number of issues and their resolution. Particularly, SDG&E agrees with PG&E's analysis and recommendations related to the

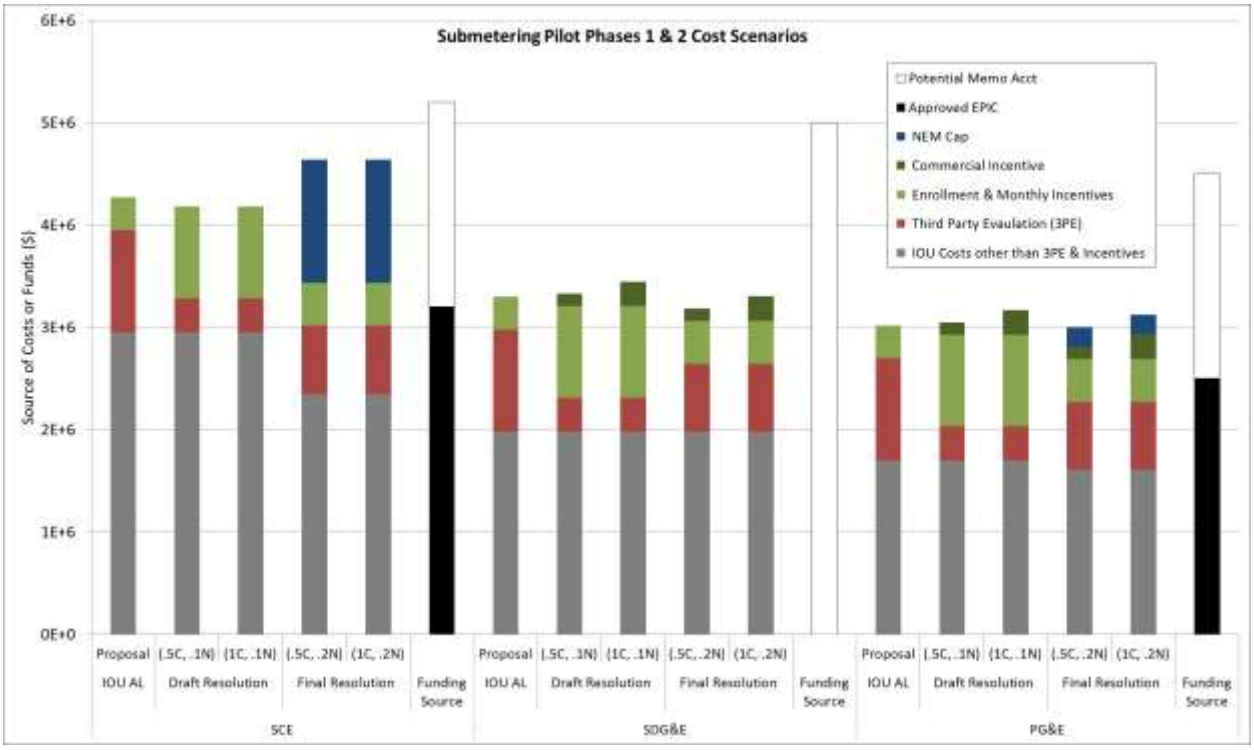
Attachment 3

Analysis of Proposed Budgets

Submetering Pilot Phases 1 & 2 Cost Scenarios		[A]	[B]	[C]	[D]	[E]	[F]	[G]	[H]
Source of Costs or Funds ($)		Attachment B	= A - C - D	Input				= B + C + D + E + F	= A - G
Scenario	Utility	Total Budget	IOU Costs other than 3PE & Incentives	Third Party Evaulation (3PE)	Enrollment & Monthly Incentives	Commercial Incentive	NEM Cap	Revised Total Budget	Delta
IOU AL Proposal	SCE	$ 4,270,000.00	$ 2,950,000.00	$ 1,000,000.00	$ 320,000.00			$ 4,270,000.00	$ -
10% NEM	SDG&E	$ 3,298,000.00	$ 1,978,000.00	$ 1,000,000.00	$ 320,000.00			$ 3,298,000.00	$ -
	PG&E	$ 3,020,000.00	$ 1,700,000.00	$ 1,000,000.00	$ 320,000.00			$ 3,020,000.00	$ -
	Total	$ 10,588,000.00	$ 6,628,000.00	$ 3,000,000.00	$ 960,000.00			$ 10,588,000.00	$ -
Comments			Equal to Proposal	1/3 Proposal	+$300 & 23/m	50% Commercial			
Draft Resolution (.5C, .1N)	SCE	$ 4,270,000.00	$ 2,950,000.00	$ 333,333.33	$ 896,000.00	$ -		$ 4,179,333.33	$ 90,666.67
50% Comm	SDG&E	$ 3,298,000.00	$ 1,978,000.00	$ 333,333.33	$ 896,000.00	$ 120,000.00		$ 3,327,333.33	$ (29,333.33)
10% NEM	PG&E	$ 3,020,000.00	$ 1,700,000.00	$ 333,333.33	$ 896,000.00	$ 120,000.00		$ 3,049,333.33	$ (29,333.33)
	Total	$ 10,588,000.00	$ 6,628,000.00	$ 1,000,000.00	$ 2,688,000.00	$ 240,000.00		$ 10,556,000.00	$ 32,000.00
Comments			Equal to Proposal	1/3 Proposal	+$300 & 23/m	100% Commercial			
Draft Resolution (1C, .1N)	SCE	$ 4,270,000.00	$ 2,950,000.00	$ 333,333.33	$ 896,000.00	$ -		$ 4,179,333.33	$ 90,666.67
100% Comm	SDG&E	$ 3,298,000.00	$ 1,978,000.00	$ 333,333.33	$ 896,000.00	$ 240,000.00		$ 3,447,333.33	$ (149,333.33)
10% NEM	PG&E	$ 3,020,000.00	$ 1,700,000.00	$ 333,333.33	$ 896,000.00	$ 240,000.00		$ 3,169,333.33	$ (149,333.33)
	Total	$ 10,588,000.00	$ 6,628,000.00	$ 1,000,000.00	$ 2,688,000.00	$ 480,000.00		$ 10,796,000.00	$ (208,000.00)
10% NEM									
Comments			without 10% NEM	2/3 Proposal	+$10 & 7.5/m	50% Commercial	+ 20% NEM		
Final Resolution (.5C, .2N)	SCE	$ 4,270,000.00	$ 2,350,000.00	$ 666,666.67	$ 420,000.00	$ -	$ 1,200,000.00	$ 4,636,666.67	$ (366,666.67)
50% Comm	SDG&E	$ 3,298,000.00	$ 1,978,000.00	$ 666,666.67	$ 420,000.00	$ 120,000.00	$ -	$ 3,184,666.67	$ 113,333.33
20% NEM	PG&E	$ 3,020,000.00	$ 1,605,000.00	$ 666,666.67	$ 420,000.00	$ 120,000.00	$ 190,000.00	$ 3,001,666.67	$ 18,333.33
	Total	$ 10,588,000.00	$ 6,628,000.00	$ 2,000,000.00	$ 1,260,000.00	$ 240,000.00	$ 1,390,000.00	$ 10,823,000.00	$ (235,000.00)
Comments			without 10% NEM	2/3 Proposal	+$10 & 7.5/m	100% Commercial	+ 20% NEM		
Final Resolution (1C, .2N)	SCE	$ 4,270,000.00	$ 2,350,000.00	$ 666,666.67	$ 420,000.00	$ -	$ 1,200,000.00	$ 4,636,666.67	$ (366,666.67)
100% Comm	SDG&E	$ 3,298,000.00	$ 1,978,000.00	$ 666,666.67	$ 420,000.00	$ 240,000.00	$ -	$ 3,304,666.67	$ (6,666.67)
20% NEM	PG&E	$ 3,020,000.00	$ 1,605,000.00	$ 666,666.67	$ 420,000.00	$ 240,000.00	$ 190,000.00	$ 3,121,666.67	$ (101,666.67)
	Total	$ 10,588,000.00	$ 6,628,000.00	$ 2,000,000.00	$ 1,260,000.00	$ 480,000.00	$ 1,390,000.00	$ 11,063,000.00	$ (475,000.00)

Assumption	AL Proposal	Draft Res	Final Res
Enrollment Incentive ($ / Participant)	200	500	210
Monthly Incentive ($ / Participant)	10	33	17.5
Ph 1 & Ph 2 Participants (Maximum # / Utility)	n/a	1000	1000
SDG&E/PG&E Commercial Incentive ($ / Participant)	n/a	240	240
Comm % of Participants - Conservative	n/a	50%	50%
Comm % of Participants - Maximum	n/a	100%	100%
NEM % of Participants	10%	10%	20%

Billing ($ / Participant)	Non-NEM	NEM	Premium Ratio
SCE	474	6000	12.6
SDG&E	Unlisted	Unlisted	1
PG&E	294	950	3.2


Submetering Pilot Phases 1 & 2 Cost Scenarios
Potential Memo Acct
Approved EPIC
NEM Cap
Commercial Incentive
Enrollment & Monthly Incentives
Third Party Evaulation (3PE)
IOU Costs other than 3PE & Incentives
Source of Costs or Funds ($)
6E+6
5E+6
4E+6
3E+6
2E+6
1E+6
0E+0
Proposal
IOU AL
(.5C, .1N)
(1C, .1N)
Draft Resolution
(.5C, .2N)
(1C, .2N)
Final Resolution
Funding Source
SCE
SDG&E
PG&E