



BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

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Application of SAN DIEGO GAS &
ELECTRIC COMPANY (U 902 E) For
Approval of Its Electric Vehicle-Grid
Integration Pilot Program.

Application 14-04-014
(Filed April 11, 2014)

**PREHEARING CONFERENCE STATEMENT OF
THE UTILITY REFORM NETWORK**



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PREHEARING CONFERENCE STATEMENT OF THE UTILITY REFORM NETWORK

I. INTRODUCTION

Pursuant to the email Ruling of ALJ Moosen on August 1, 2014, the Utility Reform Network (TURN) submits this prehearing conference statement. ALJ Moosen asked parties to comment on how this proceeding should be coordinated with Rulemaking 13-11-007. TURN suggests that this proceeding be suspended, or dismissed without prejudice, until the Commission resolves the underlying policy issue concerning utility ownership of charging infrastructure.

Alternatively, the Commission should request SDG&E to refile this application as a real “pilot,” with a substantially reduced scope and cost.

II. COORDINATION OF ISSUES WITH RULEMAKING 13-11-007

The Scoping Memo issued in Rulemaking 13-11-007 asked parties to provide comments by August 29, 2014 on a number of Phase I issues, including the question:

Should the Commission consider an increased role for the utilities in PEV infrastructure deployment and, if so, what should that role be? If the Commission should consider utility ownership of PEV charging infrastructure, how should the Commission evaluate “underserved markets” or a “market failure” pursuant to D.11-07-029? What else should the Commission consider when evaluating an increased role for utilities in EV infrastructure deployment?¹

¹ R.13-11-007, Scoping Memo, July 16, 2014, p. 13.

As detailed in TURN's protest to this application, these are precisely the issues teed up by SDG&E's request to build and own 550 charging stations. SDG&E's proposal is no mere pilot. SDG&E proposes to build and own about 550 charging stations at 40 sites. There are presently about 150 public charging sites in the greater San Diego area.² SDG&E would thus add almost one-third to the market in terms of sites, and likely a higher percentage in terms of "stations."

Whether SDG&E should be permitted to become a dominant market player is an issue that should be addressed first in the rulemaking, where all parties can provide comments and perspectives.

TURN recommends that the Commission dismiss this application without prejudice. SDG&E could refile the application after the Commission adopts a decision on the preliminary Phase I issues. The R.13-11-007 Scoping Memo anticipates that a proposed decision would be issued in late November after the submission of comments in August and September.

Alternatively, if the Commission believes that there may be useful information to be gained from a pilot, the Commission could provide SDG&E an opportunity to modify its application to propose a true "pilot," with a budget more in the \$2-\$5 million range, rather than the \$100 million range.

² According to "carstations.com." Each site appears to contain about 1 to 5 charging ports, as opposed to the higher number of ports (or "stations") per site planned by SDG&E.

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Respectfully submitted,

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