



BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF CALIFORNIA

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Order Instituting Rulemaking to Continue  
the Development of Rates and Infrastructure  
for Vehicle Electrification.

Rulemaking 18-12-006

**REPLY COMMENTS OF THE PUBLIC ADVOCATES OFFICE  
ON THE JOINT INVESTOR-OWNED UTILITIES' ELECTRIC VEHICLE  
SUBMETERING PROTOCOL**

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January 21, 2021

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## I. INTRODUCTION

Pursuant to the August 19, 2020 *E-mail Ruling Resetting Procedural Schedule to Continue the Development of a Plug-In Electric Vehicle Submetering Protocol* (E-mail Ruling), the Public Advocates Office at the California Public Utilities Commission (Cal Advocates) hereby submits these reply comments on the proposed final Electric Vehicle Submetering Protocol (EVSMP) filed by investor-owned utilities - Pacific Gas and Electric Company (PG&E), Southern California Edison Company (SCE), and San Diego Gas & Electric Company (SDG&E) - (collectively, the IOUs).<sup>1</sup> The EVSMP serves as a technical reference for submetering service agreements between electric vehicle service providers and the IOUs.<sup>2</sup> Cal Advocates supports the adoption of the EVSMP with the modifications outlined in its opening comments and in these reply comments.<sup>3</sup>

In response to opening comments filed by ChargePoint, Inc. (ChargePoint) and Enel X North America, Inc. (Enel X), Cal Advocates recommends that the California Public Utilities Commission (Commission) order the IOUs to implement joint submetering pilot programs for (1) non-residential customers and (2) multiple-customers-of-record (MCOR) customers. The results of the pilot programs will provide information to help the Commission develop modifications that may be necessary to include non-residential customers and MCOR customers in an updated EVSMP.

## II. BACKGROUND

In Decision (D.)11-07-029 and D.13-11-002, the Commission directed PG&E, SCE and SDG&E to develop rules to incorporate customer-owned submeters into their billing and metering systems for plug-in electric vehicles (PEV), and to implement a two-phase submetering pilot program to be evaluated by a third-party evaluator.

The IOUs implemented their submetering pilot programs from 2014 through 2017. Phases 1 and 2 of the pilot programs only enrolled customers operating under the single-customer-of-record (SCOR) configuration despite the MCOR configuration being the intended

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<sup>1</sup> SCE, *Final Plug-In Electric Vehicle Submetering Protocol of Southern California Edison Company, Pacific Gas and Electric Company, And San Diego Gas & Electric Company* (Dec. 21, 2020) (EVSMP).

<sup>2</sup> EVSMP, p. 4.

<sup>3</sup> See *Opening Comments of The Public Advocates Office on the Joint Investor-Owned Utilities' Electric Vehicle Submetering Protocol* (Jan. 11, 2021).

focus of Phase 2.<sup>4</sup> Nexant, the third-party evaluator selected by the IOUs, authored evaluation reports in 2016 and 2018 for Phase 1 and Phase 2, respectively.<sup>5</sup> <sup>6</sup> The Commission's Energy Division held public workshops on the results of Phase 1 and Phase 2 of the IOUs' submetering pilot programs in 2016 and 2019, respectively.

On May 12, 2020, the IOUs served their Draft Revised EVSMP on the service list for this proceeding. A workshop was held on May 22, 2020 to discuss the Draft Revised EVSMP (First EVSMP Workshop).<sup>7</sup> The IOUs hosted another EVSMP Workshop on September 30, 2020 (Second EVSMP Workshop). Opening and reply comments on the Second EVSMP Workshop discussed four issues: submeter accuracy standards, customer conflict resolution, inclusion of commercial customers in the EVSMP, and inclusion of NEM customers in the EVSMP.

On December 21, 2020, the IOUs filed their proposed final EVSMP and parties filed opening comments 20 days later on January 11, 2021.

### **III. THE INVESTOR-OWNED UTILITIES SHOULD IMPLEMENT A JOINT SUBMETERING PILOT PROGRAM FOR NON-RESIDENTIAL CUSTOMERS AND MULTIPLE-CUSTOMERS-OF-RECORD CUSTOMERS.**

In their joint opening comments, ChargePoint and Enel X argue that the Commission has signaled an intent to make submetering available to commercial customers.<sup>8</sup> ChargePoint and Enel X recommend that the Commission specify that the EVSMP is applicable to commercial and industrial customers.<sup>2</sup> Cal Advocates agrees that all customer classes (i.e., residential,

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<sup>4</sup> The SCOR configuration is where one customer is responsible for paying both the submeter and the primary load, whereas the MCOR configuration is where the submeter customer is different from the primary meter customer.

<sup>5</sup> Nexant, *California Statewide PEV Submetering Pilot – Phase 1 Report* (April 1, 2016) (Nexant Phase 1 Report), available at: <https://www.cpuc.ca.gov/WorkArea/DownloadAsset.aspx?id=6442453395>.

<sup>6</sup> Nexant, *California Statewide PEV Submetering Pilot – Phase 2 Report* (April 26, 2019) (Nexant Phase 2 Report), available at: <https://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M325/K033/325033739.PDF>. (R.18-12-006, *Administrative Law Judge's Ruling Directing Pacific Gas And Electric Company, Southern California Edison Company, And San Diego Gas & Electric Company To Respond To Outstanding Questions On The Development Of A Submetering Protocol* (Jan. 23, 2020), at Attachment C.)

<sup>7</sup> The IOUs served the Draft Revised EVSMP on the R.18-12-006 service list on May 12, 2020.

<sup>8</sup> ChargePoint and Enel X, *Comments of ChargePoint, Inc. and Enel X North America, Inc. Regarding Final Proposed PEV Submetering Protocol* (Jan. 11, 2021), pp. 2-3 (ChargePoint and Enel X Opening Comments).

<sup>2</sup> ChargePoint and Enel X Opening Comments, pp. 2-3.

commercial, and industrial) should be eligible for the EVSMP. However, submetering pilot programs should be conducted for non-residential customer classes to develop a sufficient record before the Commission determines their EVSMP eligibility. The results of these submetering pilot programs should determine any necessary changes to the implementation of the EVSMP for non-residential customers and MCOR customers.

Cal Advocates agrees that many of the technical specifications in the EVSMP are not unique to residential submetering. Except for demand charges, the rates for commercial and industrial customers do not vary significantly from residential customers' rates, suggesting that the submetering billing process should be similar for all three customer classes.<sup>10</sup> However, the implementation of submetering for non-residential electric vehicle supply equipment (EVSE) has not been sufficiently tested.<sup>11</sup> Thus, there may need to be modifications to the EVSMP protocol to accommodate non-residential customers. Cal Advocates recommends that, after Commission approval of a residential EVSMP, the Commission should require the IOUs to develop non-residential submetering pilot programs. After the pilot programs, the Commission should evaluate whether any changes to the residential EVSMP are necessary to provide EVSE submetering services to non-residential classes. Additionally, to expedite the evaluation process, the IOUs should not install new EVSE during this pilot program and instead should use sites with operational EVSE.<sup>12</sup>

Similarly, the EVSMP may require modifications before inclusion of the MCOR configuration. Even the EVSMP Nexant Report highlighted key billing and metering differences between SCOR and MCOR configurations.<sup>13</sup> However, neither phase of the IOUs' submetering

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<sup>10</sup> For example, SCE's residential TOU-D Rate and commercial TOU-GS-1 rates have per kWh time-variant rates with a 4-9 pm peak price, seasonal price variations, and both generation and distribution rates components. For both rates the generation costs are separated into a utility generating and Department of Water Resources Energy Credit components, while the distribution portion of the rate is separated into transmission, distribution, new system generation charge, nuclear decommissioning charge, public purpose program charge, Department of Water Resources Bond Charge, and the PUC reimbursement fee.

<sup>11</sup> Phase 1 of the IOUs' submetering pilot programs only included residential customers, while Phase 2 included only one commercial customer. See Nexant Phase 2 Report, pp. 12, 36.

<sup>12</sup> As suggested in *EVgo LLC Post Workshop Comments on Draft Revised Strawman for Electric Vehicle Submetering Protocol* (Oct. 12, 2020), p. 3.

<sup>13</sup> Nexant Phase 2 Report, Appendix D.

pilots included any customers under the MCOR configuration.<sup>14</sup> Thus, Cal Advocates recommends that, after Commission approval of a residential EVSMP, a second pilot program be conducted to evaluate the changes necessary to provide EVSE submetering services to MCOR configurations.

#### **IV. CONCLUSION**

For the above stated reasons, the Commission should first approve a residential EVSMP. Subsequently, the Commission should order the IOUs to implement joint submetering pilot programs for non-residential customers and MCOR customers and use the results of the pilot programs to develop an updated EVSMP that includes non-residential customers and MCOR customers.

Respectfully submitted,

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<sup>14</sup> Nexant Phase 2 Report, p. 3.