

PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

[Item #11 \(Rev. 1\)](#)

Agenda ID# 21999

ENERGY DIVISION

RESOLUTION E-5300

November 30, 2023

RESOLUTION

Resolution E-5300. San Diego Gas and Electric Advice Letter 4233-E and 4233-E-A requests approval for its Transportation Electrification Advisory Services program pursuant to Decision 21-07-028.

PROPOSED OUTCOME:

- San Diego Gas and Electric Company (SDG&E) filed Advice Letter 4233-E on May 31, 2023, to request funding for a technical assistance advisory services program, Transportation Electrification Advisory Services (TEAS), to support medium-and heavy-duty (MDHD) vehicle customers. This Resolution approves the program, with modifications to ensure that the program is reasonable and complies with the direction for technical assistance services established in D.22-11-040.

SAFETY CONSIDERATIONS:

- This advisory program will not directly install infrastructure.

ESTIMATED COST:

- The approved Transportation Electrification Advisory Services (TEAS) program will cost \$16,780,000 in total.

By Advice Letter 4233-E filed on May 31, 2023.

SUMMARY

This Resolution approves, with modifications, a technical assistance advisory services program, Transportation Electrification Advisory Services (TEAS), proposed by San Diego Gas and Electric (SDG&E) Advice Letter (AL) 4233-E and AL 4233-E-A. This

Resolution modifies the proposed program based on guidelines established for the FC1 technical assistance program in Decision (D.) 22-11-040. This Resolution approves a total budget of \$16,780,000 for SDG&E to implement a three-year technical assistance program serving medium- and heavy-duty vehicle customers that will provide web services, fleet electrification planning, vehicle-to-grid and emerging technology consulting, implementation coordination support prior to energization, and post energization support.

BACKGROUND

This Resolution disposes of SDG&E Advice Letter (AL) 4233-E and AL 4233-E-A.

1. Overview of Decision 21-07-028

Decision (D.) 21-07-028, the Near-Term Priorities Decision, was approved to address the need for additional short-term investments in electric vehicle (EV) charging infrastructure to meet 2025 state policy goals, prior to a Commission decision on investor-owned utility (IOU) Transportation Electrification Plans (TEP). D.22-11-040 declined to adopt the TEP framework as outlined in the 2020 Staff Proposal, but instead established Five-Year Funding Cycles (FC). Therefore, Near Term Priority programs will address funding needs before the statewide Funding Cycle 1 (FC1) program begins on January 1, 2025.

D. 21-07-028 Ordering Paragraph (OP) 2 establishes a preferred process to propose a near-term priority program and requires IOUs to file a Tier 3 Advice Letter (AL) by May 31, 2023, proposing a program with a duration of no more than three years after Commission authorization and a budget of up to \$20 million. D.21-07-028 requires all submissions via Tier 3 AL to use a standardized template, which Energy Division (ED) staff will review according to reasonableness criteria. Programs must address one of five near term priority areas: resilience, customers without access to home charging, medium- and heavy-duty (MDHD) sector electrification, new construction EV infrastructure, or Level 2 (L2) charging installations for low-income customers. For programs proposed via Tier 3 AL, OP 2 requires proposals to provide information on funding avenues not sourced from ratepayers, offer clear justification for why additional ratepayer investment is needed prior to TEP approval, and demonstrate what barriers to widespread transportation electrification (TE) the proposal addresses, and identify which CARB electrification mandates require investment. OP 1 requires that proposals allocate 50 percent of program infrastructure or expenditures to address the needs of underserved communities,

demonstrate coordination with and support from community-based organizations (CBOs) and local, regional, and tribal organizations, allocate 25 percent of ME&O budget to CBO outreach, identify how proposals will address barriers to equity, and identify how programs incorporate job quality and access provisions.

2. SDG&E's Proposed Program

On May 31, 2023, pursuant to D.21-07-028 OP 2, San Diego Gas and Electric (SDG&E) filed a Tier 3 AL 4233-E, for a proposed program referred to as Transportation Electrification Advisory Services (TEAS). On August 24, 2023, SDG&E filed Supplemental AL 4233-E-A, wholly superseding AL 4233. The supplemental AL provides additional information on indirect costs for the program, provides a range of customers expected to be served by the program, clarifies how the program aligns with the requirement that near-term priority programs have a three-year duration, and provides additional details on labor hours needed to implement the program. For simplicity, we describe the program using the information provided in AL 4233-E-A.

2a. Program Overview

SDG&E's proposed program would address the near-term priority area of MDHD vehicle electrification. SDG&E proposes a 3-year, \$17.9 million¹ program to provide comprehensive, end-to-end technical assistance (TA) to customers seeking to electrify MDHD vehicle fleets. The program plans to target schools, transit agencies, and fleets for cities, counties, small businesses, and tribes. TEAS would offer services to non-participants of Power Your Drive (PYD) for Fleets. SDG&E expects to serve approximately 200 customers, although the number of customers to be served through the program will vary based on fleet participation and the types of services utilized by customers.

As required by D.21-07-028 OP 1, the program would target 50 percent of program expenditures to underserved communities, as defined by the Assembly Bill (AB) 841 definition.² The program would be free to participants and entirely ratepayer funded.

¹ The program includes \$12.5 million in direct costs and \$5.4 million in indirect costs.

² AB 841 defines an underserved community as a community that meets one of the following criteria: 1) A community with a median household income less than 80 percent of the statewide average; 2) Census tracts with median household incomes at or below 80 percent of the statewide median income or with median household incomes at or below the threshold designated as low income by the Department of Housing and Community Development's list of state income limits adopted pursuant to Health and

SDG&E believes that TEAS fulfills the Commission’s vision as outlined in both D.21-07-028 and the Transportation Electrification Framework (TEF) Decision, D.22-11-040, by bridging a critical gap in time and services. SDG&E will have the opportunity to provide support to MDHD customers in the near-term, while adopting and refining an advisory services program that can be scaled to support customers for the TA program established in D.22-11-040, slated to begin in 2025.

2b. Program Services

SDG&E proposes comprehensive offerings for the TEAS program, designed to take customers from an initial interest in electrification through the post-energization stages. TEAS advisors would guide customers through program offerings, including:

Program Offering	Description
Web Services	Enhance SDG&E’s current web-based TE guidance and education services including developing a MDHD EV fuel savings calculator. Develop an expanded TE Handbook to provide a comprehensive overview of the steps needed to transition a fleet to ZEVs. This would include information on fleet assessments for electrification, vehicle selection, available electric vehicle supply equipment (EVSE), and resiliency considerations when designing EV charging loads.
Fleet Electrification Planning (EV Fleet Plans)	Develop customer-specific fleet plans, which include total cost analyses, estimated environmental benefits, available EV options, recommendations for charging equipment type and quantity based on operations, power specifications and load planning, and possible training for operation and maintenance. SDG&E may administer this service via a third party.

Safety Code § 50093.40; 3) Is within an area identified as among the most disadvantaged 25 percent of the state according to the California Environmental Protection Agency and based on the most recent California Communities Environmental Health Screening Tool, also known as CalEnviroScreen; 4) A community in which at least 75 percent of public-school students in the project area are eligible to receive free or reduced-price meals under the National School Lunch Program; and 5) A community located on lands belonging to a federal recognized California Indian tribe.

Vehicle-Grid Integration (VGI) and Emerging Technology Consulting	Provide guidance on bi-directional charging equipment as well as integrating distributed energy resources (DERs), such as photovoltaic generation and storage.
Grant Writing Support	Provide research and application assistance for grant opportunities, including researching and reviewing available grant funding opportunities, crafting strategy to maximize application scores, and preparing applications. SDG&E may administer this service via a third party.
Implementation Coordination / Pre-Energization Support	<p>Support with steps taking place prior to the customer’s energization date, including:</p> <ul style="list-style-type: none"> • Advising customers on the process for identifying when upgrades may be needed to serve anticipated customer load. • Serving as a liaison to connect the customer with various SDG&E departments and assist with a Request for Service application when large upgrades are warranted. • Providing an overview of capacity analysis and guiding customers through the process. • Supporting customers with behind-the-meter (“BTM”) assets and EVSE. • Supporting customers installing EV infrastructure under Rule 45. • Offering guidance on Type 1 and Type 2 ALM.³
Post-Energization Support	Offer consultations to help customers minimize costs, implement, and maintain load management plans, optimize EV rate and charging schedules, and utilize opportunities such as vehicle-to-everything (V2X) and low carbon fuel standard (LCFS) credits.

³ SDG&E refers to all load management solutions that include a right-sized panel and other utility equipment as Type 1 ALM and load management solutions with an undersized panel or other utility equipment as Type 2 ALM.

SDG&E plans to collect and analyze program data for the following areas to gauge effectiveness:

- Breakdown by participating market sector (e.g., small businesses, transit agencies, schools, etc.)
- Geographic location of customers and percentage of expenditures made in underserved communities, and tracking whether SDG&E is meeting its underserved community target
- Number of customers utilizing each service offering
- Number of grant applications customers pursue
- Number of customers that continue to electrify their fleets
- Number of customers that opt for bidirectional chargers
- Number of customers that opt for ALM solutions
- Number of customers that participate in other SDG&E EV infrastructure programs
- Funding amounts received at the federal, state or utility level
- Customer satisfaction via pre- and post-assessments

2c. Program Budget

SDG&E’s \$17.9 million budget⁴ for the program would be allocated across the following funding areas:

Budget Area	Cost Description	Overall Cost	Percent of Total
Administration	<ul style="list-style-type: none"> • Customer Acquisition & Engagement (CA&E) support: oversight for TEAS advisors, eligibility screening for program participants, requests for proposal (RFP) for third-party vendors, support for general customer questions • Program support: Technical infrastructure and project management 	\$1,000,000	5.6%
IT	Development and support of IT platforms to track customers throughout the customer journey, systems integration, and data reporting	\$ 380,000	2.1%

⁴ SDG&E notes that in its 2024 general rate case (GRC), it requested funding for support for two TA advisory positions. If TEAS is approved, SDG&E would remove this funding from its GRC as these roles would be supported through TEAS.

ME&O- CA&E	Internal marketing labor related to strategy, planning, execution, monitoring, and managing outreach plans	\$1,940,000	10.9%
ME&O- Marketing Education Materials & Collateral	Digital media, email campaign, direct mail campaign, general internal labor	\$320,000	1.8%
ME&O- Community-Based Organization (CBO) Engagement & Equity Outreach	Third party community outreach funding for CBO, local, regional, and tribal government outreach efforts. Assumes five organizations to support TEAS annually, for three years.	\$760,000	4.3%
Web Services	<ul style="list-style-type: none"> • Enhancements- funding to update online tools and add improvements over program duration • Operation & maintenance (O&M): funding to maintain existing features and add-on improvements • EV savings calculator/other tools update and annual maintenance with third-party vendor • TEAS specific webpage • Advisor/Program Manager efforts to update TE handbook to support TEAS 	\$1,060,000	5.9%
EV Fleet Plans	<ul style="list-style-type: none"> • Internal TEAS advisor costs to provide EV recommendations, EVSE recommendations, charging location recommendations, implementation considerations, training recommendations, quantify environmental benefits, and outline upfront and ongoing cost estimates. • Third party support to provide Coordination of final EV Fleet Plan for customers, including total cost analyses, estimated environmental 	\$3,370,000	18.8%

	benefits, available EV options, recommendations for charging equipment type and quantity based on operations, power specifications and load planning.		
VGI & Emerging Tech Consulting	<ul style="list-style-type: none"> Internal TEAS advisor costs to consult customers about technological capabilities, pilots, and VGI incentives VGI document guides with information on bi-directional charging equipment, DR, and other resiliency components 	\$ 490,000	2.7%
Grant Writing	<ul style="list-style-type: none"> Internal TEAS advisor costs Third party support to research and review available funding opportunities, determine which opportunities are appropriate for the customer, analyze potential competition and craft a strategy to obtain high scores on, and prepare an application for applicable funding opportunities. 	\$1,100,000	6.2%
Implementation Coordination / Pre-Energization Support	<ul style="list-style-type: none"> Internal TEAS advisor costs Consultations and education about ALM Compiling lists of eligible contractors and vendors 	\$1,150,000	6.4%
Post-Energization Support	<ul style="list-style-type: none"> Internal TEAS advisor costs to consult customers on post-energization topics, including ALM, EVs, V2X, LCFS, and maintenance 	\$ 560,000	3.1%
Contingency (3%)		\$ 360,000	2.0%
Indirect Costs	Overhead loaders allocating undistributed company overhead costs across O&M. Activities and services associated with direct costs, such as payroll taxes and pension and benefits, or costs that cannot be economically direct charged to the	\$5,390,000	30.1%

	project, such as administrative and general overheads.		
Total		\$17,880,000	100.0%

2d. Near-Term Priority Decision MDHD Requirements

D.21-07-028 OP 2 and OP 5 establish requirements for proposals addressing MDHD sector needs. D.21-07-028 OP 2 requires IOUs to identify which state regulations require ratepayer support prior to 2025. SDG&E states that it has designed the program to respond to the California Air Resources Board (CARB)'s Innovative Clean Transit (ICT) and Advanced Clean Fleet (ACF) rules.

D.21-07-028 OP 5 requires that IOUs describe why previously approved MDHD programs are not sufficient to meet charging needs associated with state regulations. SDG&E states that currently, providing advisory services to all MDHD fleets is beyond the scope of its PYD for Fleets program, but is critical to accelerate MDHD adoption. TE advisory services are currently not a part of the EV Infrastructure Rule 45 pathway.

Additionally, pursuant to OP 5, SDG&E describes how its program will address barriers to widespread TE that have arisen within Commission-approved programs. SDG&E states that while some support is currently being offered through other programs, including PYD for Fleets and AB 1082 and AB 1083 programs, TEAS would provide advisory services to EV customers outside of existing Commission-approved programs, would serve the need for interim TA services, and would pave the way for the advisory services ordered in D.22-11-040. SDG&E states that while FC1 will offer TA services, delays in hiring the Program Administrator make this timeline uncertain and that given their importance, the availability of TA services should not be delayed until FC1 begins. SDG&E indicates that the TEAS program can be leveraged for lessons learned to improve FC1 offerings to meet customer needs and to bridge the gap between individual Commission-approved programs and the statewide FC1 program as is the purpose of the near-term priority programs.

2e. Equity and Environmental Justice Requirements for the Proposed Program

D.21-07-028 establishes a series of equity and environmental justice requirements for stakeholder input on proposed programs, ME&O requirements, equity barriers, and job quality provisions. We summarize SDG&E's proposed strategies to address these areas below.

i. CBO/Government/Tribal Input on the TEAS Program

D.21-07-028 OP 1 requires proposals to demonstrate coordination with more than one CBO; OP 5 requires proposals to address how IOUs coordinated with state agencies, local and tribal governments, and/or regional organizations to develop the proposal. SDG&E states that it shaped its TEAS program based on lessons learned and gaps identified from one-on-one meetings, its PAC meeting and two workshops held on April 23 and 27, 2023. Participants included eight CBOs, nine local or regional government agencies, two school districts, one transit agency, three tribal organizations, and fleet customers.

Stakeholders expressed support for an advisory services program and had the following recommendations that SDG&E incorporated into its proposal:

- SDG&E should remove the minimum EV requirement for program eligibility.
- Education on cost, grant funding, and rates advising are critical supports for organizations without dedicated staff.
- Site assessments are a critical support to help customers without dedicated staff or EVSE installation expertise.
- Program materials should be tailored to meet community needs, especially binational fleets given SDG&E's territory.
- Charger utilization strategies are needed to support customers in minimizing bills.
- Given power outages and constrained grid capacity, education on how V2X and microgrid strategies can be employed should be included in the program.

Additionally, based on stakeholder input, SDG&E requests to include Class 2 trucks as medium duty (MD) vehicles to serve the small business segment of the program.

ii. ME&O Support to CBOs

D.21-07-028 OP 1 also requires that 25 percent of program ME&O be dedicated to CBO outreach. SDG&E dedicates 25 percent of the proposed ME&O budget to CBO engagement.

Budget Category	Total Direct Costs	Percent of ME&O Budget
Customer Acquisition & Engagement	\$1,940,000	64.24%
ME&O Materials	\$320,000	10.60%
CBO Engagement	\$760,000	25.17%
Total	\$3,020,000	100.00%

iii. Addressing Barriers to Equity

D.21-07-028 OP 1 requires proposals to demonstrate how they will address barriers to equity identified in the CPUC’s Environmental and Social Justice Action Plan (ESJ Action Plan) and Tribal Consultation Policy and/or Part B of CARB’s Low-Income Barriers Study. SDG&E indicates that its proposal is aligned with Goal 2, 3, and 5 of the ESJ Action Plan due to the fact that it was developed in collaboration with ESJ communities and will increase access to clean transportation in ESJ communities.⁵

SDG&E states that its proposal will prioritize meeting barriers addressed in CARB’s study by helping CBOs and public agencies access state grant funding, by supporting safe and reliable TE school bus fleets, and will incorporate feedback from state and local planning agencies to meet needs of low-income residents. Lastly, SDG&E states that the proposal is aligned with the Tribal Consultation Policy because SDG&E reached out to 11 tribes and CBOs serving tribal communities to solicit feedback on program design and encourage participation in the program.

iv. Priority Provisions for Job Quality and Access

D.21-07-028 OP 1 requires proposals to articulate how programs will incorporate job quality and job access measures. SDG&E states that it will ensure any third parties contracted into the program will meet women, minority, and disabled veteran business enterprises targets as defined in General Order 156. SDG&E states that it may develop a contract list as part of its Implementation Coordination TEAS offerings. SDG&E will focus on Electric Vehicle

⁵ ESJ Action Plan Goal 2 is to increase investment in clean energy resources to benefit ESJ communities, especially to improve local air quality and public health. Goal 3 is to strive to improve access to high-quality water, communications, and Transportation services for ESJ communities. Goal 5 is to enhance outreach and public participation opportunities for CPUC communities to meaningfully participate in the CPUC’s decision-making process and benefit from CPUC programs.

Infrastructure Training Program (EVITP) certified contractors. Contractors will be asked to self-report job quality standards and can opt-in to the list if they meet screening requirements. These measures will be aligned with requirements for the Funding Cycle 1 (FC1) program.

PROTESTS

SDG&E 4233-E received two responses. On June 20, 2023, ChargePoint provided a response to AL 4233-E. On June 20, 2023, Vehicle-Grid Integration Council (VGIC) provided a response. On June 27, 2023, SDG&E provided a response. Supplemental AL 4233-E-A did not receive any protests.

1. Charge Point's Response

ChargePoint states that TEAS does not fulfill a need unmet today in the MDHD priority area and recommends that the CPUC should not approve the program. However, ChargePoint recommends that if the CPUC does approve TEAS, the Commission should ensure the program leverages the expertise of private actors in the EV ecosystem. ChargePoint cautions against blurring the lines between a utility providing customer incentives and a utility offering input on topics such as EV procurement and management, funding options, or EVSE choices. ChargePoint recommends that IOU advisory services should focus on promoting technical guidance and educating customers about how to manage charging and effectively integrate EVs while mitigating disruptions to business operations. Lastly, ChargePoint states that it is critical that TEAS does not interrupt or interfere with the ability of competitive EV charging market providers to interact directly with site hosts and compete for their business.

In its response, SDG&E disagrees that there is no need for the program, as it has outlined how TEAS would close gaps in existing programs by providing holistic end-to-end support prioritizing school, transit agency, small business, and local municipal fleets. SDG&E states that TEAS is designed to ramp into the TA services authorized by D.22-11-040, allowing SDG&E to both fill the gap until these services come online and provide knowledge to customers that will support near-term MDHD TE efforts. SDG&E states that it will support customers in a vendor and technology-neutral way that will not interfere with the EV charging market.

2. VGIC's Response

VGIC states that it commends SDG&E's efforts in developing TEAS and believes that offerings are largely appropriate for IOU implementation. However, VGIC expresses concern that customer education efforts, if not implemented in an unbiased and transparent manner, may limit customer choice and hinder market development for some VGI solutions. VGIC includes ~~four~~[three](#) recommendations for the program:

i. **Hardware and Software-Based ALM Solutions**

VGIC expresses support for increased ALM education and implementation, including software solutions optimizing power sharing across multiple chargers at a single point of connection and co-located or integrated energy storage solutions. Although VGIC does not view the TEAS proposal as precluding any specific type of ALM technology from eligibility, the proposal does not explicitly define which ALM solutions will be presented to customers. VGIC recommends SDG&E ensure that customers receive education about both software-based ALM and hardware-based ALM to promote consistency with the Commission's recent guidance on ALM in Decision 22-12-054. SDG&E clarifies that it will not directly install ALM technologies through the program and responds that it will offer customers advice on all ALM technologies and options and may include both software-based solutions and co-located energy storage technologies, as relevant for individual customers.

ii. **Technology Neutral ALM Site Assessment**

VGIC recommends that the Commission direct SDG&E to develop and incorporate a technology-neutral standard methodology for ALM site assessment for implementation in the TEAS program. As part of this site assessment, SDG&E can calculate avoided costs determining the value of avoiding or deferring an infrastructure upgrade. To the extent TEAS participants are also receiving make-ready incentives or other ratepayer-funded charging equipment rebates, the ALM site assessment should weigh the benefits and costs of different ALM solutions. VGIC urges that customers be given the opportunity to decide whether to implement an ALM solution in exchange for cost reductions or non-monetary benefits such as backup power. If a site host decides to elect an ALM solution, they must also be free to choose which customer-side ALM technology they would like to install and use. SDG&E responds that TEAS will remain

technology-neutral and that program implementation will be consistent with CPUC decisions.

iii. Commission Monitoring of Potential Negative Impacts from TEAS

VGIC states that it is important to ensure that TEAS does not compromise innovative new offerings or limit customer choice. VGIC believes the CPUC should consider strategies to remain informed about any potential negative impact the TEAS program may have on Senate Bill 676 VGI strategies implementation and the VGI market. VGIC recommends that the annual VGI forum should expressly consider whether TEAS or other utility provided TA offerings are having negative consequences on VGI implementation. VGIC encourages the CPUC to consider how best to allow ALM solution providers to engage with customers directly during TEAS implementation. At a minimum, VGIC recommends that SDG&E consult with VGI industry stakeholders and service providers, particularly providers of V2X solutions and other new technologies, about best practices for site evaluation, installation, customer education, and interconnection. VGIC expresses that given the nascency of the VGI field, industry stakeholders and service providers have the most experience deploying real-world installations and implementing customer solutions. SDG&E responds that TEAS will not negatively affect VGI strategy implementation and market development but rather will complement and support VGI.

DISCUSSION

This section of the Resolution explains which D.21-07-028 requirements are satisfied by AL 4233-E-A as submitted and also lists modifications that are necessary to ensure that the TEAS program is aligned with previous CPUC directives for TA services established in D.22-11-040. This section also addresses the responses submitted by ChargePoint and VGIC.

1. The proposed program complies with equity requirements established in D.21-07-028 OP 1.

OP 1 requires that proposals allocate 50 percent of program infrastructure or expenditures to address the needs of underserved communities, demonstrate coordination with and support from CBOs and local, regional, and tribal organizations, allocate 25 percent of ME&O budget to CBO outreach, identify

how proposals will address barriers to equity, and identify how programs incorporate job quality and access provisions. SDG&E's proposed program complies with these objectives as described in the previous section.

2. The proposed program's scope and objectives comply with the requirements for program implementation established in D.21-07-028 OP 2.

OP 2 requires programs proposed via Tier 3 AL to be filed by May 31, 2023, and have a duration of no more than three years after Commission authorization and a budget of up to \$20 million. Additionally, OP 2 requires proposals to provide information on funding avenues not sourced from ratepayers, offer clear justification for why additional ratepayer investment is needed prior to TEP approval, demonstrate what barriers to widespread TE the proposal addresses, and identify which CARB electrification mandates require investment. SDG&E's proposed program complies with these objectives as described in the previous section. We find that SDG&E has demonstrated a clear rationale for additional ratepayer investment prior to FC1 and that TEAS will fill a critical need for TA prior to the launch of FC1 programs.

3. The proposed program's scope and objectives comply with D.21-07-028 OP 2 and 5 requirements for MDHD programs.

OP 2 requires IOUs to identify which state regulations require ratepayer support prior to 2025. OP 5 requires IOUs to describe why previously approved MDHD programs are not sufficient to meet charging needs associated with state regulations and describe how programs will address barriers to widespread TE that have arisen within Commission-approved programs. SDG&E's proposal provides responses to these questions as described in the previous section.

We find that it is prudent to establish a TA program that will support customers responding to CARB's Innovative Clean Transit and Advanced Clean Fleet regulations given the accelerated timelines and limited transitional resources associated with these regulations. Additionally, we find that SDG&E's proposal successfully demonstrates that there is a gap in TA services for certain customer types and for the period prior to the launch of FC1.

4. IOU- implemented TA must have a limited role behind the meter to ensure a competitive TE marketplace.

ChargePoint states that is necessary to clarify which activities are in scope for IOU TA to avoid blurring lines between a utility providing customer incentives and a utility offering input on topics such as EV procurement and management, funding options, or EVSE choices. We largely agree with ChargePoint's recommendation that TEAS should focus on promoting technical guidance and educating customers about how to manage charging and integrate new EVs into their operations.

We defer to the scope of activities established as appropriate for IOU TA in D.22-11-040. This Decision established a minimum scope for IOU-administered FC1 TA programs, which includes 1) basic technical assistance; (2) planning load management and other VGI considerations; (3) help with choosing rates; (4) support with walking through the IOU energization and interconnection process; (5) support and advisory services during planning, installation, and post-deployment; (6) operations post-deployment, like route optimization, load management, and future fleet electrification; and (7) available ALM and DER options to lower deployment costs.⁶ We find this scope of activities to be appropriate for TEAS.

We agree with ChargePoint that IOU TA should not be providing product specific guidance behind the meter. Consistent with D.22-11-040⁷, we clarify that SDG&E may provide product neutral guidance on EVSEs through TEAS, including amount of power and charger types needed, and may provide customers with existing approved product lists, but shall not include recommending specific products to customers. SDG&E's role post-energization should be focused on load management strategies.

5. SDG&E's proposed program scope is reduced to comply with previous CPUC directives for technical advisory services and to prevent ratepayer funds from being used more than once for a similar purpose.

While we find the majority of activities proposed by SDG&E in AL 4233-E-A to be appropriate to support MDHD customers seeking to transition to EVs, there

⁶ D.22-11-040, p 122.

⁷ D.22-11-040, p 122.

are certain services called for in SDG&E's proposal that we view as being out of scope for utility-implemented TA or duplicative of previously authorized ratepayer funding.

i. Grant writing activities

Given D.22-11-040 has established an appropriate scope for IOU TA, we find that services included in the TEAS program scope should be aligned with TA requirements for FC1. SDG&E has stated in AL 4233-E-A its intention to use learnings from TEAS to support the FC1 TA program.

We do not find grant writing to be in scope for services that will be offered as part of the FC1 TA program. Grant writing is likely to support customers in accessing BTM or vehicle assets which is inconsistent with a limited IOU role behind the meter. Therefore, we find it appropriate to remove this service from the TEAS program scope.

ii. EVSE support

D.22-11-040 clearly states that in "providing TA, the IOUs must adhere to a strict standard of technology and product neutrality to avoid interfering with competitive markets and ensure customer choice."⁸ We find this standard to be applicable to TEAS. We allow SDG&E to share existing approved product lists developed for its PYD for Fleets programs or other MDHD programs with TEAS customers. We do not find it necessary or appropriate for SDG&E to develop EVSE lists for this program, given that SDG&E has not provided a clear description of how these resources would be developed in a way that ensures product neutrality and avoids market interference.

iii. Contractor list development

SDG&E plans to develop a list of BTM contractors as part of its Implementation Coordination- Pre-Energization Services offering. The FC1 program requires the Program Administrator to develop contractor lists for each IOU territory and establishes stringent workforce requirements for the development of contractor lists. Given this, we find it inappropriate to authorize ratepayer funds twice for essentially the same purpose. We decline to allow SDG&E to implement this offering as part of its Implementation Coordination service.

⁸ D.22-11-040, p 122.

6. The total TEAS budget is reduced to \$16.78 million.

SDG&E's proposes a budget of \$17.88 million for the TEAS program. Given the changes outlined above, we propose a change to the program budget. We remove the grant writing services budget, a \$1.1 million reduction.

We decline to reduce the Implementation Coordination Pre-Energization Services budget, although we limit EVSE and contractor list development activities as described above. SDG&E may reallocate funding internally across sub-areas for this line item. This will allow SDG&E to adequately dedicate staff resources to the program services described for this service, which are core to IOU TA responsibilities, such as supporting customers with identifying when upgrades are needed, supporting customers with Request for Service applications, guiding customers through the capacity analysis process, supporting customers with Rule 45 requirements, and providing guidance on ALM.

7. The program may provide advisory services to customers seeking to electrify Class 2b trucks.

In AL 4233-E-A, SDG&E requests to be able to support customers seeking to electrify Class 2 trucks. D.20-09-025 defines MDHD as any vehicle with a gross vehicle weight rating (GVWR) over 8,500 pounds.⁹ Therefore, we find it appropriate for the TEAS program to support customers seeking to electrify Class 2b¹⁰ vehicles.

8. SDG&E should provide general ALM education as part of its VGI and Emerging Technology Consulting offering.

We decline to adopt VGIC's recommendation that SDG&E should be required to provide hardware and software based ALM education. We find that it is appropriate for SDG&E to provide general ALM education; we do not find it appropriate for the CPUC to prescribe that all customers receive education on hardware and software ALM, which may not be a fit for the needs of all sites. Furthermore, as stated above, it is not appropriate for IOUs to highlight specific products as part of their TA offerings.

⁹ D.20-09-025, p 9-10.

¹⁰ Vehicles with a GVWR between 8,501-10,000 pounds.

This is consistent with previous CPUC resolutions and Decisions, which require education about ALM but do not prescribe what ALM solutions should be addressed in the course of this education. E-5167, the EV Infrastructure Rules Resolution requires IOUs to educate customers about ALM but does not require education about specific ALM solutions.¹¹ D.22-12-054 adopts PG&E's proposal to utilize ALM to help lower installation costs and manage the program budget and requires PG&E not to prohibit BTM hardware ALM solutions but does not require customer education on hardware and software approaches.¹²

9. SDG&E is not required to develop a technology neutral methodology for ALM site assessment.

We find that VGIC's recommendation that SDG&E should be required to develop a technology neutral methodology for ALM site assessment is premature. D.22-11-040 requires the CPUC, with support from its Technical Consultant, to conduct a study to assess ALM strategies and product offerings, barriers, equity impacts, and costs to inform FC1 program implementation. We find that this work authorized in D.22-11-040 is the appropriate venue to address this question and it is not appropriate to require SDG&E to develop an ALM site assessment methodology for TEAS.

10. Existing venues will provide oversight for TEAS' impacts on SB ~~671~~676 VGI strategy implementation.

We do not share VGIC's concerns that TEAS will negatively impact SB ~~671~~676 VGI implementation, as a relatively small-scale advisory services program that is not directly installing customer infrastructure. We find that existing venues, such as the Annual VGI Forum may be appropriate to address impacts that TEAS may have on VGI implementation, as this is aligned with the forum's second goal of discussing technology enablement.¹³

The approval of the TEAS program should not be interpreted to limit activities of ALM providers. SDG&E may consult with ALM providers as part of its work setting up the TEAS program to consider how coordination between IOUs and

¹¹ E-5167, p 46.

¹² D.22-12-054, p 54.

¹³ D.22.11-040, p 174.

ALM vendors should take place as part of the program. This question shall also be considered in establishing the IOUs' FC1 TA program.¹⁴

11. Third-party evaluation is necessary to ensure that learnings from the TEAS program are able to inform the FC1 TA program.

We agree with SDG&E that learnings from the TEAS program can be leveraged to improve FC1 TA program offerings. We find the data collection fields described in Section 2b shall be the minimum data collection requirement for evaluating the TEAS program. In addition, we direct SDG&E to inform customers that program participation will be based on their agreement to participate in data collection efforts or subsequent program evaluation. We direct ED staff to conduct the evaluation of this program [using technical consulting funds authorized in D.22-11-040](#) and to work with SDG&E to identify specific data fields that shall be collected for the purpose of identifying learnings that can be leveraged to improve FC1 TA. This evaluation may also encompass learnings from other IOUs FC0 TA programs.

12. SDG&E shall establish a new one-way Near-Term Priority (NTP) TE balancing account and a sub-account for the TEAS program.

D.21-07-028 OP 2 requires IOUs to establish a new one-way Near-Term Priority (NTP) TE balancing account using the advice letter process. Additionally, OP 2 requires that IOUs establish subaccounts for each near-term priority program; each program will be limited to \$20 million. We direct SDG&E to file a Tier 1 advice letter within 60 days of the issuance of this Resolution. This advice letter shall propose a one-way Near-Term Priority Transportation Electrification Balancing Account and a new one-way balancing subaccount to track and record the actual costs for the Transportation Electrification Advisory Services program.

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. Section 311(g)(2) provides that this 30-day review period and a 20-day comment period may be reduced or waived upon the stipulation of all parties in the proceeding.

¹⁴ D.22-11-040, p189.

The 30-day review and 20-day comment period for the draft of this Resolution was neither waived nor reduced. Accordingly, this draft Resolution was mailed to parties for a 20-day comment period, and the Resolution was placed on the CPUC's agenda more than 30 days from the date that the draft Resolution was mailed.

SDG&E and VGIC filed comments on November 14, 2023. SDG&E requests clarification about the evaluation called for in the Resolution. VGIC argues that the program element to recommend ALM solutions should require SDG&E to develop an approach to conduct site assessments to consider avoided costs from employing ALM. Comments are discussed below as well as revisions made to the Resolution in response to the comments. Additionally, we have revised the Draft Resolution to correct a typo referring to SB 671 instead of SB 676.

1. Program Evaluation

SDG&E states that while the Draft Resolution finds that third-party evaluation of the TEAS program is necessary, the incremental budget to cover this activity is not specified. SDG&E states that the CPUC should clarify whether ED staff will require funding to conduct the evaluation, and if so, what the source and amount would be.

We clarify that the evaluation directed here will be conducted using ED staff technical consultant funding authorized in D.22-11-040. We have added clarification to the dicta and Findings section.

2. ALM Site Assessments for TEAS

VGIC reiterates its recommendation that the Commission should direct SDG&E to develop and incorporate a standard methodology for ALM site assessment for the TEAS program. As part of this site assessment, SDG&E can calculate avoided costs, determining the value of avoiding or deferring a given infrastructure upgrade.

VGIC states that while it appreciates CPUC's plans to assess ALM formally and holistically through the study authorized in D.22-11-040, the pace of the assessment is not aligned with customers' needs as EV charging station deployment is already outstripping IOUs' ability to approve and construct new infrastructure. ALM strategies can represent a relief valve for energization timeline challenges. SDG&E's challenges in providing customers with sufficient capacity, as outlined in the recent Energization Workshop report, could be addressed by a promotion strategy that

extends beyond education and works with customers to understand monetary and non-monetary ALM benefits. Beyond the need to accelerate energization timelines, the Kevala and Cal Advocates' Distribution Grid Electrification Model (DGEM) studies highlight that if extensive VGI strategies are not employed, EV charging will remain the largest factor in determining electrification costs. The DGEM study shows that distribution system investments can be halved through EV load management strategies such as ALM.

While EVSPs already conduct site assessments with their customers, VGIC recommends that the Commission should direct SDG&E to augment these assessments with data related to utility-side infrastructure.

We decline to adopt VGIC's recommendation. As discussed in the Draft Resolution, Energy Division plans to formally and holistically evaluate the value of ALM through the planned FC1 ALM study, which will address ALM costs and benefits. We do not find it appropriate for SDG&E to develop an ad hoc site assessment approach for a short-term technical assistance pilot when we plan to evaluate this issue across all IOU territories in the near-term.

As noted in the Draft Resolution, the establishment of the TEAS program should not be interpreted to restrict the activities of third-party ALM providers. Third party providers are not restricted from continuing to provide their existing ALM site assessments for customers.

FINDINGS

1. D.21-07-028, the Near-Term Priorities Decision, addresses the need for additional short-term investments in EV charging infrastructure to meet 2025 state policy goals. Programs must address one of five near term priority areas: resilience, customers without access to home charging, MDHD sector electrification, new construction EV infrastructure, or L2 charging installations for low-income customers.
2. D.21-07-028 OP 2 establishes a preferred process to propose a near-term priority program and requires IOUs to file a Tier 3 AL by May 31, 2023, proposing a program with a duration of no more than three years after Commission authorization and a budget of up to \$20 million. No more than \$80 million in total near-term priority funding may be requested.
3. D.21-07-028 OP 2 requires proposals to provide information on funding avenues not sourced from ratepayers, offer clear justification for why additional ratepayer

investment is needed prior to TEP approval, and demonstrate what barriers to widespread TE the proposal addresses, and identify which CARB electrification mandates require investment.

4. D.21-07-028 OP 1 requires that proposals allocate 50 percent of program infrastructure or expenditures to address the needs of underserved communities, demonstrate coordination with and support from CBOs and local, regional, and tribal organizations, allocate 25 percent of ME&O budget to CBO outreach, identify how proposals will address barriers to equity, and identify how programs incorporate job quality and access provisions.
5. For Near-Term Priority programs addressing needs of the MDHD sector, D.21-07-028 OP 2 requires IOUs to identify which state regulations require ratepayer support prior to 2025. OP 5 requires that IOUs describe why previously approved MDHD programs are not sufficient to meet charging needs associated with state regulations.
6. SDG&E filed AL 4233-E on May 31, 2023, requesting approval for the Transportation Electrification Advisory Services program to provide TA services to MDHD customers.
7. On August 24, 2023, SDG&E filed Supplemental AL 4233-E-A, wholly superseding AL 4233-E.
8. AL 4233-E proposed to provide the following TA services through the program: web services, support with fleet electrification planning, VGI and emerging technology consulting, grant writing, implementation coordination for pre-energization stages, and post-energization support.
9. The proposed program will target 50 percent of program investments to AB 841 underserved communities; the program would provide support to schools, transit agencies, and fleets for cities, counties, small businesses, and tribes.
10. The proposed program would offer services to customers beyond those participating in its Commission-approved MDHD program, PYD for Fleets. Customers would be routed to TEAS instead of PYD for Fleets for support if they are electrifying under Electric Rule 45, are not eligible for PYD for Fleets, or would receive greater benefit through state and federal incentives.
11. SDG&E requested \$17.88 million in total funding for the TEAS program.
12. AL 4233-E received responses from ChargePoint and VGIC. Supplemental AL 4233-E-A was not protested by any stakeholder.
13. AL 4233-E-A complies with the D.21-07-028 OP 1 requirement that the program must allocate 50 percent of program expenditures to address the needs of underserved communities, demonstrate coordination with and support from

CBOs and local, regional, and tribal organizations, allocate 25 percent of ME&O budget to CBO outreach, address barriers to equity, and incorporate job quality and access provisions.

14. AL 4233-E complies with the D.21-07-028 OP 2 requirement that programs proposed via Tier 3 AL must be filed by May 31, 2023, and have a duration of no more than three years after Commission authorization and a budget of up to \$20 million. Additionally, the AL meets the OP 2 requirement to provide information on funding avenues not sourced from ratepayers, offers clear justification for why additional ratepayer investment is needed prior to TEP approval, and demonstrates what barriers to widespread TE the proposal addresses. AL 4233-E will support customers responding to to CARB's Innovative Clean Transit and Advanced Clean Fleet regulations.
15. AL 4233-E-A complies with the D.21-07-028 OP 5 requirement to describe why previously approved MDHD programs are not sufficient to meet charging needs associated with state regulations and identifies how the program will address barriers to widespread TE that have arisen within Commission-approved programs.
16. D.22-11-040 establishes a minimum scope for the IOU-administered FC1 TA program, which includes 1) basic technical assistance; (2) planning load management and other VGI considerations; (3) help with choosing rates; (4) support with walking through the IOU energization and interconnection process; (5) support and advisory services during planning, installation, and post-deployment; (6) operations post-deployment, like route optimization, load management, and future fleet electrification; and (7) available ALM and DER options to lower deployment costs.
17. It is reasonable for SDG&E's role in TEAS to focus on promoting technical guidance and educating customers about how to manage charging and integrate new EVs into their operations.
18. It is reasonable to require services offered for the TEAS program should align with the scope and requirements established for FC1 TA, as SDG&E has stated its intention to use learnings from TEAS to inform its FC1 TA program.
13. It is reasonable to reduce the scope of SDG&E's proposed program to align with FC1 TA scope and to prevent ratepayer funds from being used more than once for a similar purpose.
14. It is reasonable to eliminate grant writing services from the TEAS program given their lack of alignment with the FC1 TA scope.

15. It is reasonable to require SDG&E provide technology and product neutral TA to customers.
16. It is reasonable to remove BTM contractor list development from the TEAS Implementation Coordination- Pre-Energization Services offering as ratepayer funds have already been authorized for a similar purpose in D.22-11-040.
17. It is reasonable to reduce the total TEAS budget to \$16.78 million by eliminating the grant writing line item.
18. Consistent with D.20-09-025, it is reasonable to define MDHD for the purpose of the TEAS program as any vehicle with a GVWR of over 8,500 pounds, which may include Class 2b trucks.
19. It is reasonable to expect SDG&E to provide general ALM education as part of its VGI and Emerging Technology Consulting offering.
20. It is not reasonable to expect SDG&E to develop a technology neutral methodology for ALM site assessment as an existing methodology has not been identified by the CPUC and D.22-11-040 already requires rigorous study of ALM related questions.
21. It is not reasonable for the CPUC to establish additional pathways to measure and monitor TEAS impacts on SB ~~671~~676 VGI strategy implementation, as existing venues such as the Annual VGI Forum provide an opportunity to discuss technology enablement.
22. Authorization of the TEAS program should not be interpreted to limit the activities of ALM providers.
23. It is reasonable for SDG&E to consult with ALM providers as part of its work setting up the TEAS program to consider how coordination between IOUs and ALM vendors should take place.
24. It is reasonable to direct SDG&E to inform customers that program participation will be based on their agreement to participate in data collection efforts or subsequent program evaluation.
- [25. It is reasonable to conduct an ED staff led evaluation of TEAS using technical consulting and support funding.](#)

THEREFORE, IT IS ORDERED THAT:

1. San Diego Gas and Electric Company Advice Letter AL 4233-E-A is approved with modifications as specified herein.

2. The budget for San Diego Gas and Electric Company's Transportation Electrification Advisory Services program shall not exceed \$16.78 million in total costs.
3. San Diego Gas and Electric Company shall inform customers that participation in the Transportation Electrification Advisory Services program will be based on agreement to participate in data collection efforts or subsequent program evaluation.
4. San Diego Gas and Electric Company shall file a Tier 1 advice letter within 60 days of the issuance of this Resolution. This advice letter shall propose a one-way Near-Term Priority Transportation Electrification Balancing Account and a new one-way balancing subaccount to track and record the actual costs for the Transportation Electrification Advisory Services program.

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 November 30, 2023, the following Commissioners voting favorably thereon:

Rachel Peterson
Executive Director