Date of Issuance: April 19, 2024

PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

ENERGY DIVISION **RESOLUTION E-5314**
April 18, 2024

R E S O L U T I O N

Resolution E-5314. Pacific Gas and Electric Advice Letter 6883-E, 6883-E-A, and 6883-E-B request approval for its Transportation Electrification Advisory Services program pursuant to Decision 21-07-028.

PROPOSED OUTCOME:

- Pacific Gas and Electric Company (PG&E) filed Advice Letter 6883-E on March 16, 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 and additional Pre- and Post-Energization services.

SAFETY CONSIDERATIONS:

- This Resolution does not have any safety considerations. This advisory program will not directly install infrastructure.

ESTIMATED COST:

- The approved Transportation Electrification Advisory Services (TEAS) program will cost $18,768,110 in total.

By Advice Letter 6883-E on March 16, 2023, 6883-E-A, on May 31, 2023, and 6883-E-B filed on October 13, 2023.

SUMMARY

This Resolution approves, with modifications, a technical assistance advisory services program, Transportation Electrification Advisory Services (TEAS), proposed by Pacific Gas and Electric (PG&E) Advice Letter (AL) 6883-E, AL 6883-E-A, and AL 6883-E-B. 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 $18,768,110 for PG&E to implement a three-year technical assistance program serving medium- and heavy-duty vehicle customers that will provide web services, fleet electrification planning, implementation coordination, and pre-and post- energization support. This Resolution directs PG&E to inform customers that program participation will be based on agreement to participate in data collection efforts or subsequent program evaluation. This Resolution further directs PG&E to provide MDHD customers with Pre- and Post-Energization Services to support efficient management of the energization queue, and ongoing grid-friendly EV charging behavior.

BACKGROUND

This Resolution disposes of PG&E Advice Letter (AL) 6883-E, AL 6883-E-A, AL 6883-E-B.

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. PG&E's Proposed Program

On March 16, 2023, pursuant to D.21-07-028 OP 2, Pacific Gas and Electric (PG&E) filed a Tier 3 AL 6883-E, for a proposed program referred to as Transportation Electrification Advisory Services (TEAS). On May 31, 2023, PG&E filed Supplemental AL 6883-E-A, partially superseding AL 6883-E. The supplemental AL provides additional information on the research, benchmarking, and analysis that led PG&E to propose the program, provides additional clarity around the number of customers to be served by the program, expands on financial assumptions within the program budget, and details how PG&E plans to align TEAS with the FC1 TA program. On October 13, 2023, PG&E filed Supplemental 6883-E-B to propose to amend the scope and budget for one program offering, Pre-Energization Services, in light of the finalization of the California Air Resources Board (CARB)'s Advanced Clean Fleets (ACF) rule.

2a. Program Overview

PG&E's proposed program would address the near-term priority area of MDHD vehicle electrification. PG&E proposes a 3-year, $19.33 million program to provide comprehensive, end-to-end technical assistance (TA) to customers seeking to electrify MDHD vehicle fleets. TEAS would offer services to customers electrifying through Rule 15, 16, and 29 as well as its MDHD TE program, EV Fleet.

D.21-07-028 OP 1 requires programs to target a minimum of 50 percent of program expenditures to underserved communities, as defined by the Assembly Bill (AB) 841 definition.[1] The TEAS program would spend no less than 80 percent of program budget in underserved communities. The majority of proposed program services would only provide support to schools, transit agencies, municipal governments, and small businesses located in underserved communities. However, one service offering, Pre-Energization Services, would be available to all MDHD customers seeking to electrify their fleets. PG&E's rationale for allowing broader access to this program offering is that the scope of customer segments subject to the ACF rule is broader than these customer types, and that therefore there is a need for this service to support customers from all market segments subject to ACF, who reside in all areas of the state, not only AB 841 communities.

2b. Program Services

For simplicity, we describe the proposed program offerings using the revised scope in AL 6883-E-B. PG&E proposes comprehensive offerings for the TEAS program, designed to take customers from an initial interest in electrification through the post-energization stages.

PG&E expects that customers would first engage with TEAS through Marketing, Education and Outreach (ME&O) efforts. ME&O will direct customers to the TEAS webpage where they will be able to apply for the program by completing a simple form. Qualifying applicants would be contacted by a TEAS program advisor who would guide them through the various service offerings based on their fleet's TE needs, including:

[1] 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 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.

Program Offering	**Description**
Web Services	Support customers in walking through PG&E's online service offerings including an EV fleet saving calculator and TE guidebook, which provides a comprehensive overview of the TE process.
Fleet Electrification Planning	Develop customer-specific fleet plans, which may 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. PG&E may administer this service via a third party.
Implementation Coordination	Support customers with steps to coordinate EVSE and BTM infrastructure installations, including: • Developing an opt-in BTM contractor list with information about available contractors in a customer's region • Capacity Pre-Assessment providing information about available circuit capacity, required equipment, and preliminary design • Adaptive Load Management (ALM) guidance education about software installation services available from third party vendors • Unidirectional and bidirectional charger technology guidance on types of chargers available, incentives, and vehicle to everything (V2X) pilots that will enable customers to take advantage of incentives

Program Offering	Description
Pre-Energization Support	The TEAS advisor will provide an initial customer screening to identify potential capacity constraints. The TEAS advisor will work with Service Planning and Delivery (SP&D) for small loads less than two megawatts or Distribution Planning for large load or multi-site projects greater than two megawatts to determine capacity constraints for a proposed site. If capacity constraints are identified, the TEAS advisor will work with customers to determine alternative (e.g. non-wire) solutions and modify site design as needed. Solutions can include DERs, simple load limits, automated load management or a flexible service connection providing varying capacity allowances based on hourly transformer or circuit loading. If no constraints are identified, the customer will continue in the process and receive additional post-energization support as applicable.
Post-Energization Support	Offer consultations to help customers minimize costs, implement and maintain load management plans, optimize EV rate and charging schedules, develop a plan for EVSE operation and maintenance, and utilize opportunities such as vehicle-to-everything (V2X) and low carbon fuel standard (LCFS) credits.

2c. Customers Served through the Programs

The program will be free to participants and entirely ratepayer funded. PG&E expects that the number of customers served through the program will vary, based on the size of participating fleets and the types of services utilized by customers, as TEAS will allow customers to select the program services that they need. In AL 6883-E-B, PG&E offers four scenarios for the number of total customers served through the program, depending on uptake of various TEAS services:

- ***Baseline assumption***: This scenario, as presented in AL 6883-E, assumes all customers would receive all program services.
- ***Scenario 1***: This scenario assumes that the program will primarily serve customers in the initial stages of fleet electrification, who will need support with planning and understanding site capacity.

- ***Scenario 2***: This scenario assumes that the program will primarily serve customers in the later stages of fleet electrification who will need support with BTM coordination, and post-energization steps. This scenario maximizes the number of customers served through the program.
- ***Scenario 3***: Scenario 3 presents a case in which more customers receive pre-energization services, although is still weighted towards customers at the later stages of fleet electrification. PG&E believes that Scenario 3 is more likely than Scenario 2, as it expects customers will have a demand for pre-energization services.

The resulting number of total customers and an estimated per-customer cost for each of these scenarios is shown below:

Scenarios	**Total customers**	**Fleet electrification planning** (% customers using service)	**Pre-energization services** (% customers using service)	**Implementation coordination** (% customers using service)	**Post-energization** (% customers using service)	**Per customer cost** ($)
Baseline Assumption [2]	~250	100%	100%	100%	100%	~$80,000
Scenario 1	~560	50%	50%	25%	20%	~$36,000
Scenario 2	~900	20%	20%	60%	60%	~$22,000
Scenario 3	~800	20%	25%	70%	70%	~$25,000

2d. Data Collection

PG&E plans to collect and analyse program data on a regular cadence for the following areas to gauge effectiveness:

- Geographic location of customers
- Types of customers applying for the program
- Customer acceptance rate
- Industries represented: schools, transit agencies, small businesses

[2] AL 6883-E states PG&E's baseline scenario assumes approximately 250 customers will be interested in participating in TEAS, which is based on the number of customers that applied to their EV Fleet program, but we deemed unable to participate due to outstanding barriers. PG&E asserts TEAS was designed, in part, to address these barriers.

- Number of customers utilizing each service offering
    - Number of customers opting for bidirectional chargers
    - Customer satisfaction
    - Number of customers participating in EV Fleet program through TEAS

Additionally, TEAS would use the SB 350 reporting template to share annual reports with the Commission.

2e. Program Budget

PG&E proposes a $19.33 million budget for the program, to be allocated across the following funding areas:

Budget Area	**Description**[3]	**Overall Cost**	**Percent of Total**
Administration	• Internal Labor to oversee TEAS Customer Acquisition and Engagement (CA&E) advisors and provide CA&E specific analytical support • Internal Project Management Office (PMO) support for reporting, data requests, and general program evaluation through 2027 • Program communications to establish TEAS program email and translate program materials to meet customer needs	$1,590,000	8.2%
IT	• Platform for tracking entire customer journey through 2027: initial build, enhancements, tech enablement support, licenses, ongoing O&M • Internal PMO support for IT efforts, such as requirements gathering, product testing, training, documentation	$850,000	4.4%
Budget Area	**Description**[4]	**Overall Cost**	**Percent of Total**

[3] Details on each budget category provided in workpapers for AL 6883-E-B filed with the CPUC.

[4] Details on each budget category provided in workpapers for AL 6883-E-B filed with the CPUC.

Customer Acquisition & Engagement	• Internal CA&E labor to support efforts outside of specific TEAS offerings, like eligibility screening, requests for proposal to identify Fleet Electrification Planning and Grant Writing vendors, and general customer questions prior to a signed customer contract; CA&E labor continues through 2027 to assist with program closeout	$2,890,000	14.9%
Budget Area	**Description**	**Overall Cost**	**Percent of Total**
ME&O	• Digital media • Email outreach • Marketing Creative: Materials to support customer acquisition, CBO, and other partnership outreach • Labor: Internal marketing labor related to strategy, planning, execution, monitoring, and managing outreach plans	$500,000	2.6%
ME&O- CBO Outreach	• Four CBOs will support TEAS annually • In addition to CBO outreach, TEAS will leverage internal teams such as PG&E community and tribal liaison groups to conduct community outreach without allocating TEAS budget for these services.	$600,000	3.1%
Business Energy Solutions	• Funding to support internal PG&E Business Energy Solutions personnel to funnel applicants to the TEAS program	$150,000	0.8%
Budget Area	**Description**[5]	**Overall Cost**	**Percent of Total**
Web Services	• EV Savings Calculator Software Tool	$840,000	

[5] Details on each budget category provided in workpapers for AL 6883-E-B filed with the CPUC.

	Enhancements: updated functionality for TEAS, and add-on improvements • EV Savings Calculator Assumptions O&M: maintain existing feature integration and add-on improvements • CA&E internal labor support: Oversight of EV Calculator Savings Update & annual maintenance with a third-party vendor • TEAS-specific webpage • CA&E internal labor support: TEAS webpage development • TE Guidebook: TEAS Advisor/Program Manager efforts to update guide plan to align with TEAS		4.3%
Fleet Electrification Planning	• Third-party administration of the service. • TEAS Internal Advisor Labor Costs to coordinate interactions between third-party contractor and customers	$4,850,000	25.1%
Budget Area	**Description**[6]	**Overall Cost**	**Percent of Total**
Implementation Coordination	• Capacity Estimation/Adaptive Load Management - Internal Labor		

[6] Details on each budget category provided in workpapers for AL 6883-E-B filed with the CPUC.

	• Capacity Pre-Assessment - Assessment Costs: TEAS will pay for optional capacity pre-assessment service that gives customers information about available circuit capacity, required equipment, and preliminary design at an earlier stage in the site development process. • Internal PG&E labor (outside Clean Energy Transportation team) to coordinate service planning pre-assessments • BTM Contractor List - Internal Labor: TEAS may offer a list of BTM vendors available in customers' areas to eligible customers. This would be a list of BTM contractors who would opt-in to be part of the list. Internal PG&E labor would manage the list. • Bidirectional Charging Technology Guidance - Internal Labor: TEAS Advisors will provide charger guidance, as well as the incentives PG&E offers to cover their costs, and available V2X pilots • Program Guidance Document Development - Internal Labor: TEAS Advisor would develop program materials to help guide customer consultations.	$1,820,000	9.4%

Budget Area	**Description**[7]	**Overall Cost**	**Percent of Total**
Pre-Energization Support	• • Large customer distribution capacity review- 2 FTEs to support	$4,000,000	20.7%

[7] Details on each budget category provided in workpapers for AL 6883-E-B filed with the CPUC.

	• Small customer distribution capacity review- 1 FTE to support • Non-wires alternatives - 1 FTE to support		
Post-Energization Support	• TEAS Advisors would meet with each customer up to six times to consult on any one of five post-energization topics: ALM, BEV, V2X, LCFS, and O&M • Development of program materials to help guide customer consultations for any one of the five post-energization topics	$670,000	3.5%
Contingency (3%)		$580,000	3.0%
Total		**$19,340,000**	

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. PG&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. PG&E states that it has seen the need for the program from the implementation of its EV Fleet MDHD infrastructure rebate program as it has identified customers who were interested in participating but needed support in finalizing plans before being ready to electrify. PG&E's finds that customers in disadvantaged communities and certain segments such as schools, small businesses, and transit agencies, lack the resources to be able to initiate, complete, and operate TE projects effectively. PG&E finds evidence of this gap from delays in signing customer contracts, high program attrition rates, BTM construction delays, and evidence of customers charging at peak times. By providing support to disadvantaged community customers during every stage of the electrification process, PG&E expects to be able to reduce the incidence of these adverse outcomes.

Additionally, pursuant to OP 5, PG&E describes how its program will address barriers to widespread TE that have arisen within Commission-approved programs. PG&E states that while some support is provided to customers through its EV Fleet program, PG&E cannot provide the level of comprehensive customers support needed to adequately address the needs cited above.

PG&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 PG&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. PG&E states that it shaped its TEAS program based on lessons learned and gaps identified from strategy work taking place in 2021 and 2022, one-on-one meetings, and PAC meetings on June 9, 2022 and December 8, 2022. PG&E consulted with 10 CBOs, six local or regional government agencies, one school districts, two transit agencies, two tribal organizations, and three fleet customers.

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

- PG&E should be proactive in moving customers through the process by providing consistent follow up; PG&E plans to address this feedback by having TE advisors provide routine status checks and serving as a point of contact for customers.
- PG&E should partner with CBOs and local governments to engage with schools, small businesses, and transit agencies; PG&E includes plans to engage these organizations as part of its ME&O strategy.

- PG&E should not be overly reliant on web resources to communicate with customers; PG&E has planned multiple customer communications channels.
- Outreach materials should differ between rural and urban areas; PG&E plans to consider differentiated outreach tactics and materials for 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. PG&E will dedicate 54.5 percent of the proposed ME&O budget to CBO engagement, which will support four CBOs in conducting outreach on an annual basis. PG&E will use a solicitation process to contract with CBOs across its service territory. Contracts will establish the scope of work and deliverables expected from the CBOs. PG&E plans to tailor specific strategy and outreach tactics in partnership with the selected CBOs.

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. PG&E indicates that its proposal is aligned with Goal 2, 3, and 5 of the ESJ Action Plan as it was developed in collaboration with ESJ communities and will increase access to clean transportation in ESJ communities.[8]

PG&E states that its proposal will prioritize meeting barriers addressed in CARB's Low-Income Barriers study by targeting AB 841 priority communities for inclusion in the program, ensuring outreach to these communities through its ME&O plan to increase their awareness of clean transportation and mobility options, and providing a comprehensive advisory service for AB 841 communities. Lastly, PG&E states that the proposal is aligned with the CPUC's Tribal Consultation Policy because PG&E met with three tribes during the program development stage to solicit feedback on TEAS and will continue engagement throughout program implementation.

iv. Priority Provisions for Job Quality and Access

[8] 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.

D.21-07-028 OP 1 requires proposals to articulate how programs will incorporate job quality and job access measures. PG&E states that it will ensure any third party contractors who are included on a contractor list as part of the implementation coordination offering will be required to meet screening criteria aligned with those established for the Funding Cycle 1 program.[9]

3. **Balancing Account**

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. In AL 6883-E-B, PG&E proposes to add a new one-way TEAS Subaccount to its Transportation Electrification Balancing Account (TEBA). The TEAS Subaccount will track and record the difference between actual and adopted expenses of the TEAS program, up to the adopted amount. At the end of the program, if adopted expenses exceed actual expenses, PG&E will refund the difference through the Annual Electric True-Up (AET) Advice Letter or through another rate change advice letter, as approved by the Commission.

PROTESTS

PG&E AL 6883-E received one protest and two responses. On April 5, 2023, The Utility Reform Network (TURN) submitted a protest. On April 5, 2023, ChargePoint and Vehicle-Grid Integration Council (VGIC) submitted responses to the AL. On April 12, PG&E provided a response. On May 5, ChargePoint submitted a filing to correct several misstatements of fact made by PG&E in its response to parties. PG&E AL 6883-E-A received one response, from ChargePoint on June 20, 2023. PG&E AL 6883-E-B received one protest, from the Public Advocates Office (Cal Advocates) on November 2, 2023. PG&E provided a response on November 9, 2023.

Protests and Responses to AL 6883-E

1. **TURN Protest**

   TURN states that $1.24 million in Administration costs and $2.89 million in Customer Acquisition & Engagement (CA&E) costs in Tables 1a and 1c of the Costs and Workpaper section of AL 6883-E appear to be double counted. TURN also states that the CPUC should require PG&E to demonstrate how funding for TEAS is complementary to, and not duplicative of the administrative and

[9] D.22-11-040 p 145-146 establishes minimum workforce criteria for the FC1 program.

education budgets for the EV Fleet program, since TEAS is designed to support EV Fleet.

In its response, PG&E emphasizes that TEAS is an independent program and is not an add-on to EV Fleet and will require its own resources, such as fleet advisors and program managers. With respect to the CA&E costs, PG&E states that while these line items look similar, they address separate needs. The administrative costs will include supervision, management, and contract analysis related to CA&E while the CA&E line item will cover customer-specific tasks such as having onboarding specialists engage with program participants to provide support and education. All TEAS customers will be assigned advisors who will work with customers for months at a time. Therefore, both budget items require separate funding for full-time employees.

2. ChargePoint's Response

ChargePoint states that PG&E's TEAS proposal does not provide a clear justification for why near-term ratepayer funding should be allocated to a program that duplicates efforts by PG&E, the private market, and other Commission approved programs. ChargePoint states that PG&E provides insufficient evidence that the program design will meaningfully address the gaps PG&E cites as reasons for the program including delays in signing customer contracts, attrition rates, BTM construction delays, customers applying for grants, and peak time charging. These gaps could be better addressed by other TE programs, such as the Commission approved Electric Vehicle Charge 2 program. ChargePoint further asserts that PG&E is already required by Rule 29 to address similar functions to TEAS, such as coordination on project design issues. Outside of utility provided TA, private market actors such as electric vehicle service providers (EVSPs) provide TE planning services. AL 6883-E does not describe how TEAS would complement, rather than duplicate these services. Lastly, TEAS would likely duplicate activities covered by the FC1 TA program, beginning in 2025. Because there will be funding for TA services within the next two years, additional ratepayer funding is unnecessary, and would be better allocated for programs meeting a distinct, unmet need within NTP areas.

In its response, PG&E disagrees that the TEAS program duplicates efforts by other programs and emphasizes that the TEAS program provides comprehensive TE guidance that other programs would not provide to MD/HD fleets in underserved communities. PG&E states that EV Charge 2 does not address the MD/HD sector and therefore is not relevant for this program. PG&E also states that overlap with private market offerings is not relevant as these are provided at market cost and therefore may be out of reach for underserved community customers who are the target participants for TEAS. PG&E provides the table shown below to indicate that other entities do not comprehensively provide all of the services proposed for the TEAS program through one seamless experience, targeted exclusively to underserved communities. PG&E provides the table below to show the difference between these three offerings.

	TEAS	**EV Fleet**	**Rule 29**	**TA in D.22-11-040**	**Private Market**
Web Services	Yes	No	No	No	No
Fleet Electrification Planning	Yes	No	No	Partial*	Yes
Grant Writing	Yes	No	No	No	Yes
Implementation Coordination	Yes	Partial	Partial	Partial**	No
Post-Energization Guidance	Yes	No	No	No	No
	TEAS	**EV Fleet**	**Rule 29**	**TA in D.22-11-040**	**Private Market**
Start Date	2024-2026	Ongoing	Ongoing	2025	Ongoing
Participation Cost to Customers	None	None	None	N/A	Market cost

*May not include the custom planning report that TEAS would provide.
**These programs offer some aspects of TE implementation coordination, but do not replicate the BTM contractor list, capacity assessment, ALM guidance, and charger technology guidance proposed for TEAS.

ChargePoint provided a corrective to PG&E's response. In this document, ChargePoint acknowledges that responding parties are not permitted under General Order 96-B to reply to utility replies. However, it states that its response is provided to correct a factual error in the PG&E Reply and ensure the Commission has accurate information in considering the merits of Advice 6883-E. ChargePoint provides a revised version of the table to clarify how they believe other programs PG&E is implementing, including TA in D.22-11-040 and the private market provide similar services to TEAS. Changes from PG&E's table are indicated in italics.

	TEAS	EV Fleet	Rule 29	TA in D.22-11-040	Private Market
Web Services	Yes	No	No	*May be in scope*	*Yes*
Fleet Electrification Planning	Yes	No	No	*May be in scope*	Yes
Grant Writing	Yes	No	No	*May be in scope*	Yes
Implementation Coordination	Yes	Partial	Partial	*May be in scope*	*Yes*
Post-Energization Guidance	Yes	No	No	*May be in scope*	*Yes*
Start Date	2024-2026	Ongoing	Ongoing	2025	Ongoing
Participation Cost to Customers	None	None	None	N/A	*May have a market cost*

As the Program Handbook has not yet been developed for the D.22-11-040 TA, ChargePoint states that it is premature to state that the FC1 program will not adopt services planned for the TEAS program.

In addition, ChargePoint issues several corrections related to private market offerings:

- ***Web Services***: Private market companies provide similar services such as a free fleet assessment. Charge Point provides a free evaluation of EV charging needs and estimates savings with charging management tools. This service includes utility cost modeling and guidance on grants/incentives.
- ***Implementation Coordination***: ChargePoint's fleet services provide support for program implementation, including bidding, vendor selection, and permitting. ChargePoint's consultative design/build services guide customers with end-to-end

services. Other EVSPs including Shell Recharge and bp pulse provide similar solutions.

- ***Post-Energization Support***: ChargePoint's services and integrated EV charging management software provide visibility into charging costs to achieve lowest total cost of ownership. Other EVSPs including Shell Recharge and bp pulse provide similar solutions.
- ***Market Cost***: Many private market services are provided to customers at no cost, such as ChargePoint's fleet assessment, as they are considered customer acquisition or lead generation costs.

3. VGIC's Response

VGIC states that it commends PG&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 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 PG&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. PG&E responds that it will consider expanding its list of eligible ALM solutions to include co-located and integrated storage technologies, in addition to software based solutions.

ii. Technology Neutral ALM Site Assessment

VGIC recommends that the Commission direct PG&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, PG&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. PG&E responds that TEAS will only provide education about ALM and ALM software installation services available from third-party vendors. As it will not be providing the ALM service itself, it does not have plans to provide site assessments to customers.

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 PG&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. PG&E responds that TEAS, as an advisory program that will increase MDHD fleets’ awareness of VGI, will not negatively affect VGI strategy implementation and market development.

Response to AL 6883-E-A

1. **ChargePoint Response to AL 6883-E-A**
ChargePoint reiterates its contention that TEAS does not fulfill a need unmet today in the MDHD priority area requiring use of limited near-term ratepayer funding 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.

Protest to AL 6883-E-B

1. **Cal Advocates Protest of AL 6883-E-B**

Cal Advocates states that PG&E has made major changes to the TEAS program's scope and budget in AL 6883-E-B, but that the same level of programmatic and budgetary details provided in AL 6883-E has not been provided.

i. Changes to Implementation Plans and Budget

Cal Advocates finds that PG&E does not explain which implementation steps in the proposal remain intact and which have been modified. For example, PG&E does not provide information on how its ME&O implementation will change as a result of a reduction in the ME&O budget from $1.2 million to $600,000.[10] Cal Advocates also notes that PG&E did not include an updated implementation timeframe for the program, even though D.21-07-028 requires completion of proposed programs within three years. Cal Advocates recommends that ED should require PG&E to submit a Supplemental Tier 3 AL that supersedes all previous versions and clearly lays out proposal details. In its response, PG&E states that requiring it to file a supplemental AL would only further delay much needed advisory services.

PG&E states that the only changes made by AL 6883-E-B were to eliminate one service, Grant Writing, and replace it with a new Pre-Energization service. The scope of other activities remains unchanged. Therefore, the changes proposed in AL 6883-E-B are not significant enough to require an additional advice letter. PG&E highlights the following changes to the budget that have occurred as a result

[10] PG&E reallocated these ME&O funds to the Pre-Energization offering proposed in AL 6883-E-B.

of eliminating the Grant Writing service and replacing it with the Pre-Energization service:

Category	Original Budget in AL 6883-E ($M)	Updated Budget in AL 6883-E-B ($M)	Difference ($M)
Administration	$1.79	$1.59	($0.19)
Community Outreach	$1.20	$.60	($.60)
Grant Writing	$3.11	0	($3.11)

PG&E states that its original Community Outreach budget proposed in AL 6883-E was 70 percent of its ME&O spending, although D.21-07-028 requires a minimum of 25 percent of ME&O budgets to be dedicated to CBO outreach. While this budget has been reduced to allow PG&E to be able to move additional funds to the Pre-Energization service offering, it remains 55 percent of ME&O spending, exceeding the Decision target. PG&E's overall tactics for CBO outreach will remain unchanged.[11]

ii. Equity Requirements

Cal Advocates states that AL 6883-E-B does not demonstrate compliance with D.21-07-028 in two ways. First, the letter does not explain implementation tactics that PG&E will use to satisfy the D.21-07-028 requirement that 50 percent of program spending take place in AB 841 communities. Secondly, Cal Advocates finds that AL 6883-E-B fails to explain how PG&E will satisfy the requirement to reduce barriers to equity that prevent equal program participation between customers from underserved communities and other program types. Cal Advocates states that since PG&E states in AL 6883-E-B that TEAS will be open to all MDHD customers, it is unclear what implementation steps PG&E will take to ensure that at least 50 percent of program spending is dedicated to AB 841 communities. PG&E also requests budget fungibility across program categories to meet customer needs, which could undermine its commitment to meet the 50 percent underserved community

[11] Workpapers submitted to the CPUC by PG&E for AL 6883-E-B indicate that CBO outreach will fund outreach on behalf of four organizations annually, while workpapers submitted in AL 6883-E-A indicated that eight organizations would receive funding to support this work annually. Other than the number of organizations engaged, outreach tactics remain unchanged.

requirements. Therefore, Cal Advocates finds that CPUC should not approve PG&E's TEAS program budget.

PG&E's reply to Cal Advocates clarifies that only the $4 million Pre-Energization service will be available to all MDHD customers seeking to electrify their fleets, as stated in AL 6883-E-B. All other services for the program will serve 100 percent underserved community customers including schools, transit agencies, small businesses, and municipalities; the implementation tactics for these services have not changed. This amounts to $15.33 million in program spending that will be directed to underserved community customers. Therefore, no less than 80 percent of program spending will support underserved communities. As the Pre-Energization service will be available to underserved community customers, there is a potential for the program to exceed this minimum threshold.

DISCUSSION

This section of the Resolution explains which D.21-07-028 requirements are satisfied by AL 6883-E, AL 6883-E-A, and AL 6883-E-B as submitted and 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. **PG&E has provided sufficient information in AL 6883-E, AL 6883-E-A, and AL 6883-E-B to enable the CPUC to evaluate the program.**
   Cal Advocates contends that PG&E has made major changes to the scope and budget for the TEAS program in AL 6883-E-B, but that PG&E has not provided the same level of programmatic and budgetary details in AL 6883-E-B as in previous versions. Cal Advocates states that PG&E should be required to file an additional supplemental AL outlining these changes in depth.

   We find that PG&E has provided sufficient information to allow CPUC to evaluate the proposed program. While changes to one program service and budget changes were made, as described in AL 6883-E-B, we do not find that these changes constitute substantial changes to the program that require an additional filing beyond what has been provided in AL 6883-E-B. Additionally, alongside AL 6883-E-B, PG&E filed confidential workpapers with the CPUC that provide an updated version of the programmatic and budgetary details provided in AL 6883-E-A.

2. **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. Cal Advocates argues that PG&E's proposed program does not comply with the requirement to spend 50 percent of program budget on underserved communities.

We disagree with Cal Advocates and find that PG&E's proposed program complies with OP 1 objectives, as demonstrated in the previous section.
A minimum of 80 percent of program spending will support underserved communities, as only one program service, Pre-Energization Services, will be available to MDHD customers outside of underserved communities. Further, the budget for Pre-Energization Services is approximately 20% of the total budget, but it will be available to all customers, including those in underserved communities, guaranteeing that the program will comply with the equity requirements.
PG&E's outreach spending will remain at 55 percent of CBO budget.

3. **Allowing PG&E fungibility between program budget categories will not compromise its ability to meet the D.21-07-028 equity target.**
Cal Advocates argues that PG&E should not be allowed to reallocate spending across TEAS program categories, as this could compromise the D.21-07-028 requirement of 50 percent minimum spending in disadvantaged communities.

We disagree with Cal Advocates and find it appropriate to allow fungibility across program services. As discussed, only one program service, Pre-Energization Services, will be available to customers outside of underserved communities. While PG&E has developed several scenarios for likely uptake of program services, we find it important to allow customers to elect to participate in program services that are relevant for them.
Since 80 percent of program spending will serve underserved communities, there is sufficient flexibility to allow PG&E to reallocate budget across categories if needed without compromising the requirement to spend a minimum of 50 percent of program infrastructure budget in disadvantaged communities.

4. **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.
PG&E's proposed program complies with these objectives as described in the previous section.

We find that PG&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. While ChargePoint asserts that PG&E's proposal duplicates a number of efforts currently being taken by the private market, we find that PG&E's TEAS proposal will compliment, rather than compete or duplicate these efforts. We find that the proposed TEAS proposal will focus on services that are within the responsibility of the utility, such as PG&E's proposal to enhance and discuss the EV Savings Calculator Software Tool with customers, or the Implementation Coordination's efforts to provide customers with an understanding of the utility energization process. PG&E's targeted services will provide support to segments of underserved community customers while providing an opportunity to pilot energization services that may be expanded for the FC1 TA program. Further, as TEAS will provide further data to inform the

FC1 TA program, the three year pilot duration will provide the Commission with data to ensure any duplicated efforts are not scoped into the FC1 TA program.

5. **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. PG&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, in response to ChargePoint's response that PG&E's proposed services are duplicative of private sector offerings, we find that PG&E's proposal successfully demonstrates that there is a gap in TA services for certain customer types in disadvantaged communities and for the period prior to the launch of FC1. Lastly, PG&E's proposed Pre-Energization offering will fill a gap in the market by providing assessments to identify potential capacity constraints, work which the IOUs are uniquely positioned to assess.

6. **The program proposal's separate line items for Administration and CA&E are appropriate; additionally, it is appropriate for PG&E to include separate administrative resources in its TEAS program.**
   In response to AL 6883-E, TURN protests that the TEAS budget line items for Administration and CA&E are double-counted, and that TEAS does not require separate administrative resources as it will be part of the EV Fleet program. We agree with PG&E's response that EV Fleet is a separate program from its proposed TEAS program and that the distinct TEAS offerings will require separate administrative resources.

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

In its response to AL 6883-E-A, 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.[12] We find this scope of activities to align with the core roles of the IOU and 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.22-11-040[13], we clarify that PG&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. PG&E's role post-energization should be focused on load management strategies.

8. **PG&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 PG&E in AL 6883-E, AL 6883-E-A, and 6883-E-B to be appropriate to support MDHD customers seeking to transition to EVs, there are certain services called for in

[12] D.22-11-040, p 122.
[13] D.22-11-040, p 122.

PG&E's proposal that we view as being out of scope for utility-implemented TA or duplicative of previously authorized ratepayer funding.

i. 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."[14] We find this standard to be applicable to TEAS. We allow PG&E to share existing approved product lists developed for its EV Fleet Program with TEAS customers. We do not find it necessary or appropriate for PG&E to develop EVSE lists for this program, given that PG&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.

ii. CA&E scope

Workpapers provided by PG&E for AL 6883-E-B still include PG&E facilitating an RFP process to hire a third-party contractor to facilitate the grant writing service. As this service has been eliminated from the scope, this RFP process is no longer needed.

PG&E includes three tasks under the 20,420 labor hours[15] it has dedicated to the CA&E line item, which is priced at $2,888,000:

- Internal CA&E labor to help with efforts outside of specific TEAS offerings, like eligibility screening
- Requests for proposal to identify Fleet Electrification Planning and Grant Writing vendors
- General customer questions prior to a signed customer contract

As PG&E has not provided more granular assumptions, we assume that labor hours are equally allocated across these program categories. This would mean approximately 6,807 labor hours for each of these three tasks across the three years of program implementation. With one fewer request for proposal process needed, we estimate that only 3,403 hours would be needed for this task given the revised program scope. PG&E prices labor for this task at $141.40 per hour. Accordingly, we reduce the budget for CA&E by $481,890, resulting in a budget of $2,406,110 over the three years of implementation.

[14] D.22-11-040, p 122.
[15] Figure provided in workpapers for PG&E AL 6883-E-B.

iii. Contractor list development

PG&E plans to develop a list of BTM contractors as part of its Implementation Coordination 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 PG&E to implement this offering as part of its Implementation Coordination service. Accordingly, we reduce PG&E's budget to carry out this work by $80,000, the line item for this work in AL 6883-E-B.

iv. Summary of budget changes as a result of scope changes

PG&E proposes a budget of $19,330,000 for the TEAS program. We reduce PG&E's budget for TEAS by $481,890 for CA&E RFP services that will not be needed and by $80,000 because we are removing contractor list development from the program scope. Therefore, we establish a $18,768,110 budget for the TEAS program.

9. **PG&E should provide general ALM education as part of its VGI and Emerging Technology Consulting offering.**

   We decline to adopt VGIC's recommendation that PG&E should be required to provide hardware and software based ALM education for all customers. We find that it is appropriate for PG&E to provide general ALM education; this ALM education could include information about hardware and software-based solutions. However, we do not find it appropriate for the CPUC to mandate that all customers receive education on hardware and software based 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, as this education shall be required to remain product neutral.

   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.[16] D.22-12-054 adopts PG&E's proposal to utilize ALM to help lower installation costs and manage the program budget

[16] E-5167, p 46.

and requires PG&E not to prohibit BTM hardware ALM solutions but does not require customer education on hardware and software approaches.[17]

10. **PG&E is not required to develop a technology neutral methodology for ALM site assessment.**
We find that VGIC's recommendation that PG&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[18]. Further, R.23-12-008 includes within its scope VGI and related issues, which includes ALM. The CPUC does not yet have sufficient record to determine the role of the IOU in developing standard ALM site assessment, nor the specifics of such site-assessments. We do not find this Resolution as the appropriate venue to address these questions, and defer to the work authorized in D.22-11-040 and that will be performed in R.23-12-008 as the appropriate venue to address this question and it is not appropriate to require PG&E to develop an ad hoc ALM site assessment methodology for TEAS, when we plan to evaluate this issue across all IOU territories in R.23-12-008.

11. **Existing venues will provide oversight for TEAS' impacts on SB 676 VGI strategy implementation.**
We do not share VGIC's concerns that TEAS will negatively impact SB 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.[19]

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

[17] D.22-12-054, p 54.
[18] The preliminary scoping memo of R.23-12-008 includes Vehicle-Grid Integration, which may establish goals and targets for advancement of vehicle-grid integration, assess programmatic and policy interventions, and affordability considerations with a focus on the following strategic areas: a) technology enablement; b) rates and demand flexibility programs; and c) transportation electrification grid planning.
[19] 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.[20]

12. **Third-party evaluation is necessary to ensure that learnings from the TEAS program are able to inform the FC1 TA program.** We agree with PG&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 2d shall be the minimum data collection requirement for evaluating the TEAS program. In addition, we direct PG&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 PG&E to identify specific data fields that shall be collected for the purpose of identifying learnings that can be leveraged to improve FC1 TA, including which specific SB 350 reporting fields will be relevant for the evaluation of this program. This evaluation may also encompass learnings from other IOUs FC0 TA programs.
13. **Pre- and Post-Energization Support**
We agree with PG&E that Pre- and Post-Energization support is a key component of TA services and should be scoped into the TEAS program. We find that PG&E's proposal to provide MDHD customers with more transparency on the grid's capacity to support their requested load, and dedicated consultative support throughout the energization process will lead to more efficient management of the energization queue, which may lead to improvements to PG&E's efforts to accelerate their energization timing. Further, we find that PG&E's Post-Energization services will support the Commission's goals of ensuring customers align their charging behaviors with price signals that reflect grid-conditions while still meeting their fleet charging needs, which may allow PG&E to add more EV load to the distribution grid at a lower overall costs.

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

[20] D.22-11-040, p189.

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.

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.

On March 28, 2024, PG&E and Cal Advocates filed comments on the draft Resolution.

Cal Advocates comments assert the draft resolution contains factual and legal errors, as it relies on new material information in PG&E's Reply to Cal Advocates' Protest to reach contradictory conclusions that AL 6883-E, 6883-E-A, and 6883-E-B contain sufficient information on their own and that a supplemental is not necessary. Cal Advocates therefore requests the CPUC direct PG&E to submit its new information in a supplemental before the CPUC votes on the draft resolution.

Cal Advocates claims that in AL 6883-E-B, PG&E proposes to expand its TEAS program to all MDHD customers, without limitations to any specific service. Cal Advocates further asserts that this supplement filing further proposes to reduce PG&E's equity spend from 100 percent of the program to 50 percent, and without explanation, that PG&E will ensure at least 50 percent of the program funds are spent on customers in underserved-communities.

Cal Advocate protested AL 6883-E-B, asserting that as PG&E proposes to expand its TEAS program to all MDHD customers, PG&E should supplement AL 6883-E-B with an explanation for how they plan to meet the requirements of D.21-07-028. In their response to Cal Advocate's protest, PG&E states, without citing to language in AL 6883-E-B or elsewhere on the record, that the request to expand the TEAS program is limited to pre-energization services. Cal Advocates further asserts that PG&E's Reply does not address their protest concerning the reduction of equity spend from 100 percent of the program spend to 50 percent, instead, PG&E claims that its' underserved communities spend will be "no less than 80 percent of the program budget" because it will only expand pre-energization services to all MDHD customers.

Cal Advocate's assertion that the draft resolution contains factual and legal errors as it relies on the assertions in PG&E's reply rather than citing to anything in AL 6883-E-B or elsewhere in the record, in agreeing with PG&E that the modifications proposed in AL 6883-E-B are limited only to pre-energization services.

Regarding the factual errors, Cal Advocates states the draft resolution cites to AL 6883-E-B, rather than PG&E's reply, in stating that only pre-energization services will be open to all customers, rather than the whole TEAS program. Further, the draft resolution does not address PG&E's request to reduce its equity spend to 50 percent of the program.

Cal Advocates asserts the draft resolution legally errs because it relies extensively on the new material information that PG&E presents for the first time in their reply, rather than within AL 6883-E, 6883-E-A, or 6883-E-B. Cal Advocates argues that it is arbitrary and capricious for the draft resolution to rely on new information in PG&E's reply to conclude that Cal Advocates' protest incorrectly asks the CPUC to require PG&E to supplement AL 6883-E-B with new information.

Cal Advocates contends that in citing PG&E's reply to reject Cal Advocates' protest, the draft resolution violates General Order (GO) 96-B, which provides the procedures for utilities to revise advice letters. GO 96-B allows for parties to submit a substitution sheet to make minor revisions or corrections to an advice letter, while major revisions are required to be addressed via a supplemental advice letter or a withdraw of the advice letter. Cal Advocates maintains that the draft resolution's extensive reliance on new information provided by PG&E in their reply materially and substantially changes the analysis of AL 6883-E-B, and deprives parties of due process, by denying them a meaningful opportunity to analyze and comment on PG&E's proposal as modified by PG&E's reply.

We disagree with Cal Advocates that the draft resolution commits factual and legal errors. As stated in Cal Advocates' comments on the draft resolution, PG&E's AL 6883-E-B purpose is generally to outline its pre-energization services and capacity related issues. Because AL 6883-E-B was submitted to specifically outline pre-energization services, it is clear that the expansion of the "programs scope" to all MDHD EV customers was limited to the pre-energization services program, and not all of TEAS. Indeed, AL 6883-E-B states that PG&E submitted "this supplemental Advice Letter to outline pre-energization services," so the scope of the proposal is clear. This reading is further supported in PG&E's response, which confirms to Cal Advocates that only the $4 million for pre-energization services discussed in AL 6883-E-B will be available to all MDHD EV customers, and that the remaining $15.33 million of TEAS's budget will only be available to customers in underserved communities. We therefore reject Cal Advocate's request to direct PG&E to file a supplemental advice letter to include this information prior to voting on the draft resolution.

PG&E's comments express general support for the resolution, and requests the CPUC modify the resolution to allow for PG&E to implement the TEAS program for the full three-year proposed implementation period, starting 180-days from the date the resolution is approved. PG&E states they designed the TEAS program to be implemented over a course of three-years, as directed by D.21-07-028.[21] However, D.22-11-040 directed that all near-term priority programs to not accept customer applications or agreements after December 31, 2026, unless specifically directed otherwise by the Commission. PG&E states that if considering the 9-12 month range for setting the program up for implementation, TEAS program implementation will realistically be no more than two-years.

We deny PG&E's request to allow them to implement the TEAS program for three-years, starting 180-days from the date the resolution is approved. As PG&E notes, D.22-11-040 establishes a sunset date of December 31, 2026 for approved near-term TE priority programs. While this decision does allow for the CPUC to grant exemptions, we do not find PG&E's request sufficiently justifies the need for an extension beyond December 31, 2026. As D.22-11-040 directed PG&E to design and implement a broad Technical Assistance program, which is expected to begin by the sunsetting of the near-term TE priority programs, we do not find it reasonable to allow for two different technical assistance programs to be offered simultaneously for a prolonged period of time. Therefore, PG&E shall ensure that implementation of TEAS ends no later than December 31, 2026.

FINDINGS

[21] D.21-07-028 established a maximum near-term priority implementation duration of three years, starting from the date of the program's approval.

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. PG&E filed AL 6883-E on March 16, 2023, requesting approval for the Transportation Electrification Advisory Services program to provide TA services to MDHD customers.
7. On May 31, 2023, PG&E filed Supplemental AL 6883-E-A, partially superseding AL 6883-E.
8. On October 13, 2023, PG&E filed Supplemental AL 6883-E-B, partially superseding AL 6883-E and 6883-E-A.
9. PG&E AL 6883-E proposed to provide the following TA services through the program: web services, support with fleet electrification planning, grant writing, implementation coordination, and post-energization support. These services

were restricted to serve MDHD customers in AB 841 underserved communities, including schools, transit agencies, and fleets for cities, counties, small businesses, and tribes.

10. AL 6883-E-B proposed a modified scope for program services: it eliminated the grant writing component of the program and replaced it with a pre-energization service. Only the pre-energization service would be open to all MDHD customers seeking to electrify. All other program services including web services, support with fleet electrification planning, implementation coordination, and post-energization support would serve underserved community customers only. Therefore, the proposed program as outlined in AL 6883-E-B would target
80 percent of program expenditure to AB 841 underserved communities.
11. PG&E requested $19.33 million in total funding for the TEAS program.
12. AL 6883-E received a protest from TURN and responses from ChargePoint and VGIC. ChargePoint provided a correction to PG&E's response for AL 6883-E. Supplemental AL 6883-E-A was not protested by any stakeholder. Supplemental AL 6883-E-B received a protest from Cal Advocates.
13. AL 6883-E-B complies with the D.21-07-028 OP 1 requirement that the program must allocate a minimum of 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 a minimum of 25 percent of ME&O budget to CBO outreach, address barriers to equity, and incorporate job quality and access provisions.
14. It is responsible to allow PG&E to have fungibility across program services to meet customer needs as the program matures; PG&E has sufficient margin to ensure it can still meet the D.21-07-027 OP 1 requirement that programs dedicate a minimum of 50 percent of program expenditures to underserved communities.
15. AL 6883-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. The proposed TEAS program will support customers responding to to CARB's Innovative Clean Transit and Advanced Clean Fleet regulations.

16. AL 6883-E 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.
17. PG&E has demonstrated that its proposed TEAS service is distinct from the EV Fleet program and therefore requires separate administration budget.
18. PG&E has demonstrated that its administration and CA&E budget line items serve distinct purposes.
19. 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.
20. It is reasonable for PG&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.
21. It is reasonable to require services offered for the TEAS program should align with the scope and requirements established for FC1 TA, as PG&E has stated its intention to use learnings from TEAS to inform its FC1 TA program.
12. It is reasonable to reduce the scope of PG&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.
13. It is reasonable to require PG&E provide technology and product neutral TA to customers.
14. It is reasonable to remove BTM contractor list development, with an estimated $80,000 budget, from the TEAS Implementation Coordination Services offering as ratepayer funds have already been authorized for a similar purpose in D.22-11-040.
15. It is reasonable to reduce the CA&E budget for TEAS by $481,890, as PG&E will not need to carry out two RFP processes for the program.
16. It is reasonable to establish a new budget of $18,768,110 for the TEAS program.

17. It is reasonable to expect PG&E to provide general ALM education, which may include education on hardware and software based ALM, as part of its VGI and Emerging Technology Consulting offering.
18. It is not reasonable to expect PG&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.
19. It is not reasonable for the CPUC to establish additional pathways to measure and monitor TEAS impacts on SB 676 VGI strategy implementation, as existing venues such as the Annual VGI Forum provide an opportunity to discuss technology enablement.
20. Authorization of the TEAS program should not be interpreted to limit the activities of ALM providers.
21. It is reasonable for PG&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.
22. It is reasonable to require PG&E to inform customers that program participation will be based on agreement to participate in data collection efforts or subsequent program evaluation.
23. It is reasonable to conduct an ED staff led evaluation of TEAS using technical consulting and support funding.
24. Providing Pre-Energization services will aid in the submission of high-quality applicant applications for service, enabling customers the opportunity to build more cost-effective charging, and more efficient management of the energization queue.
25. Providing Post-Energization services will encourage EV charging to align with price signals that reflect grid conditions, that may lead PG&E to add more EV charging load to the grid at a lower overall cost.

THEREFORE, IT IS ORDERED THAT:

1. Pacific Gas and Electric Company Advice Letter AL 6883-E, AL 6883-E-A, and AL 6883-E-B are approved with modifications as specified herein.
2. The budget for Pacific Gas and Electric Company’s Transportation Electrification Advisory Services program shall not exceed $18,768,110 million in total costs.

3. Pacific 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.

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 April 18, 2024, the following Commissioners voting favorably thereon:

/s/ RACHEL PETERSON
Rachel Peterson
Executive Director

ALICE REYNOLDS
President

DARCIE HOUCK
JOHN REYNOLDS
KAREN DOUGLAS
Commissioners

Commissioner Matthew Baker recused himself, did not participate in the vote of this item.