

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

Application of PacifiCorp (U901E) for Approval of
its 2017 Transportation Electrification Programs.

And Related Matters.

Application 17-06-031
(Filed June 30, 2017)

Application 17-06-033
Application 17-06-034

**OPENING TESTIMONY OF LILLIAN RAFII
ON BEHALF OF SMALL BUSINESS UTILITY ADVOCATES
ON THE TRANSPORTATION ELECTRIFICATION PROPOSALS FROM
PACIFICORP, LIBERTY UTILITIES (CALPECO ELECTRIC) LLC, AND GOLDEN
STATE WATER COMPANY ON BEHALF OF ITS BEAR VALLEY ELECTRIC
SERVICE DIVISION**

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I. INTRODUCTION

In accordance with the October 25, 2017 *Scoping Memo and Ruling of Assigned Commissioner and Administrative Law Judges*, I hereby submit this opening testimony on behalf of Small Business Utility Advocates (“SBUA”) concerning PacifiCorp’s, Liberty Utilities (CalPeco Electric) LLC’s (“Liberty CalPeco”), and Golden State Water Company on behalf of its Bear Valley Electric Service Division’s (“Bear Valley”) transportation electrification (“TE”) proposals. This report addresses issues relating to the small business community under the priority review and standard review transportation electrification proposals from the three above referenced investor owned utilities.

California’s small businesses are key stakeholders in the transportation electrification process and potential widespread adopters of electric vehicles (“EV”) and EV fleets. Therefore, participation and solicitation of small commercial customers will be integral to achieving SB 350 and greenhouse gas (“GHG”) reduction goals. Awareness and inclusion of small commercial customers are needed for the investor owned utilities to implement their programs. Additional

considerations to the current proposals as they stand are necessary to advance widespread TE and further encourage participation by small business ratepayers. SBUA's testimony recommends the following measures to be advanced in PacifiCorp's, Liberty CalPeco's, and Bear Valley's proposals:

For Liberty CalPeco's proposed TE programs:

- On the DC Fast Charger Program:
 - In selecting sites, consider small business clusters and their driving habits as part of their evaluation.
 - Set a non-binding goal of 15% for contracting with small businesses.
 - Measure contracting participation from small businesses, usage by customer class, any lessons learned from marketing to small businesses, and any lessons learned from small commercial customer usage of the DC fast chargers.
- On the Small Business Charger Installation Rebate Program:
 - As part of marketing and outreach, consider a targeted marketing strategy toward small businesses, such as reaching them through repeated messaging across multiple media channels.

For Bear Valley's proposed TE programs:

- On the Destination Make Ready Rebate Pilot:
 - As part of data gathering and metrics, measure: (1) small business participation in contracting opportunities as part of the program, and (2) provide lessons learned in marketing and outreach to small businesses to be included in the annual report.
 - Create a system for routinely updating the reference list of contractors and electricians to ensure that new market participants are included.
 - Set a non-binding goal of selecting 20% of the rebates for small businesses.
- On the EV-TOU Pilot Rebate Program:
 - As part of data gathering and metrics, provide lessons learned from the small business community in the Bear Valley region.

For PacifiCorp's proposed TE programs:

- On the Outreach and Education Program:
 - As part of the Technical Assistance component, (1) promote contracting opportunities to small business EVSE installers as part of the procurement process, and (2) alert small businesses in the service territory on the program. On the procurement front, pilot additional methods of outreach to potential EVSE installers to broaden the EVSE installer options to qualified small businesses.

- Create a targeted marketing, education, and outreach program to increase awareness of EVs to the small business community, for example, a strategy of repeated messaging across various media channels to raise awareness of the programs and educate on available features.
- As part of data gathering and metrics, track the following: (1) the number of small businesses that are targeted by each component, (2) the number of small businesses who participate in each component, (3) lessons learned from the marketing, outreach, and education strategy.
- As part of Self-Service Resources and Tools Program, set clear metrics that measure small business sector participation before contractors and tools are selected, such as measuring: (1) the number of small business visitors to the site, and (2) the number of small business contractor partners. Set an interim review timeline, such as at the program halfway mark to evaluate the metrics.
- On the Demonstration and Development Program:
 - A non-binding goal of 20% in selecting small businesses as grant winners.

II. BACKGROUND

A. SBUA and the Small Business Community

SBUA’s organizational mission is to help small businesses by representing them as a community and protecting their utility and energy-related concerns. SBUA is participating in this proceeding because the small business community, historically, has been underrepresented in proceedings before the Commission. SBUA is the only party in this proceeding focusing exclusively on the small business community as a whole. Small business interests diverge from large businesses on important issues including the justifications and rationales for utility programs, the expenditure of utility revenues, and on other energy matters, including their ability to participate in Transportation Electrification.

SB 350 directed the Commission to order the utilities under its jurisdiction to “accelerate widespread transportation electrification to reduce dependence on petroleum, meet air quality standards, and reduce emissions of greenhouse gases to 40 percent below 1990 levels by 2030

and to 80 percent below 1990 levels by 2050.¹ Engagement from small businesses and their employees is critical to accomplishing Senate Bill (“SB”) 350 and transportation electrification goals. Small businesses are nimble and an ideal customer segment to promote the adoption of air quality and transportation electrification goals. Small businesses make up the large portion of medium and heavy-duty vehicle operators in California. They also make up a significant portion of the respective utilities’ service territories and customer segments. According to 2014 U.S. Census data, there are 869,876 businesses with less than 100 employees in California that, collectively, hire 7.5 million Californians and pay approximately \$344 billion in annual payroll to employees California.² According to the Small Business Administration, there are approximately 3,689,700 small businesses in the state that comprise 99.2% of all employer firms, provide 50.6% of the private sector employment, account for approximately 90% of new job creation, and contribute approximately 75% of the gross state product.³ SBUA believes that the small business customer segment can and should play a role in the state’s path to achieve its zero-net energy (“ZNE”) and GHG goals. For that and other reasons discussed below, the Commission, PacifiCorp, Liberty CalPeco, and Bear Valley should be particularly attentive to ensuring their priority review and standard review projects are fair and just to small commercial customers and contain measures to maximize small business participation, including with appropriate incentives, education and outreach, and designs for the standard review projects.

¹ Pub. Util. Code Section 740.12.

² U.S. Census Bureau, American Fact Finder, data of businesses under 100 employees (2014), available at www.factfinder.census.gov.

³ California Small Business Profile, Small Business Association Office of Advocacy. *See* www.sba.gov/advocacy/small-business-profiles-states-and-territories-2016 and www.sba.gov/sites/default/files/advocacy/California.pdf.

B. Summary of This Report and Recommendations

SBUA supports, with modifications, the programs the three utilities' have proposed to advance transportation electrification in their service regions, which face unique geographical and population differences as compared to the larger investor owned utilities. To fully succeed in widespread transportation, small businesses in California will need to be included in both EV adoption and in contracting opportunities. If the transportation electrification programs, which are paid for by utility customers, largely function to redistribute funds from small commercial ratepayers to the benefit of large ratepayers or residential customers, this raises significant fairness concerns. All three utilities mentioned the unique geographic challenges of adopting EV in their non-urban regions and all describe a desire to promote widespread EV deployment. In this spirit, SBUA's comments in this report touch heavily on issues of outreach and data collection of TE options for small businesses. We hope that our input and evaluating lessons learned will help to establish a final charging infrastructure program, commercial EV rate, and marketing and outreach programs that are generally more effective for ratepayers and specifically better incorporates and considers the needs of small businesses.

III. DISCUSSION

A. Liberty CalPeco Proposals

Liberty CalPeco proposes a broad suite of programs in response to California's ambitious climate change goals, which include the following priority review programs: DC Fast Charger Project, Residential Charger Installation Rebate Program, Small Business Charger Installation Rebate Program, and Customer Online Resource Project.⁴ In addition, they propose a standard

⁴ *Application of Liberty Utilities (CalPeco Electric) LLC (U 933 E) For Approval Of Its 2017 Transportation Electrification Proposals*, June 30, 2017 ("Liberty CalPeco Application"), pp. 2-3.

review program of an EV Bus Infrastructure Program.⁵ SBUA appreciates the wide range of Liberty CalPeco’s proposed priority review and standard review programs in addressing California’s TE goals. For example, Liberty CalPeco has created one of the only programs in both the instant and larger utility transportation electrification proceeding that specifically directs a program toward small business customers.

1. DC Fast Charger Project

In its DC Fast Charge Priority Review Project, Liberty CalPeco intends to install, own, and maintain between five to nine DCFC stations at participating customer sites.⁶ Each site may include up to four dual-port charging stations, and Liberty CalPeco has identified at least two potential locations: (1) South Lake Tahoe Airport; and (2) the Alpine Meadows Ski Resort near North Lake Tahoe. In making their site decisions, Liberty CalPeco will evaluate sites that serve the intra-regional corridors in the Lake Tahoe Region that connect the City of South Lake Tahoe, Kings Beach, Statelin, Incline Village, Homewood, and Tahoe City.⁷

i. Site Selection

In making their site decisions, Liberty CalPeco will evaluate sites that serve the intra-regional corridors in the Lake Tahoe Region that connect the City of South Lake Tahoe, Kings Beach, Stateline, Incline Village, Homewood, and Tahoe City.⁸ SBUA recommends that in evaluating their sites, Liberty CalPeco consider small business clusters and their driving habits as part of their evaluation. The utility should describe how they considered these features in their

⁵ *Id.* at p. 3.

⁶ *Testimony of Liberty Utilities (CalPeco Electric) LLC (U 933-E) In Support Of Its 2017 Transportation Electrification Application*, June 30, 2017 (“Liberty CalPeco Testimony”), p. 8.

⁷ *Id.*

⁸ Liberty CalPeco Testimony, p.8.

annual report.

ii. Competition Issues

As part of the program, Liberty CalPeco will run a competitive RFP bid process for equipment, software, service, and installation to the top EV charging equipment suppliers in the industry.⁹ To promote TE contracting opportunities, SBUA recommends a non-binding goal of contracting with 15% small businesses in its RFP process. SBUA also recommends gathering data on the small business who applied for the RFP for equipment, software, service, and installation and those who were selected.

Under the Public Utilities code, the TE programs cannot unfairly compete with nonutility enterprises.¹⁰ SBUA has unfair competition concerns that by owning and operating the charging stations, the utility eliminates the ability of a small commercial or other market participant to do so, hindering competition.

iii. Data Gathering, Metrics, and Evaluation

Given the geography and non-urban region, small businesses are likely to face unique challenges in deploying TE. Liberty CalPeco has included detailed metrics that they will measure in their priority review projects.¹¹ Liberty CalPeco addresses the gaps and issues facing EV deployment in the Tahoe Regional Planning Agency's Tahoe-Truckee Plug-In Electric Vehicle Readiness Plan, which primarily evaluated the issues and gaps of EV deployment faced by residents.¹² These programs are laudable because they will provide a wealth of information in

⁹ Appendix 2, SBUA Data Requests to Liberty CalPeco, Set One ("SBUA-Liberty-1"), question 3(a).

¹⁰ Pub. Util. Code Section 740.12(b).

¹¹ Liberty CalPeco Testimony, p. 3 (Liberty CalPeco will track, for example, the number of EV charging stations installed and number of rebates issued in their annual report).

¹² *Id.* at p. 6 (referring to Attachment 1).

evaluating current EV deployment. Gathering related information on small business behavior, preferences, issues, and barriers would be beneficial in informing future programs. Given this, as part of the DC Fast Charger Project, SBUA recommends measuring contracting participation from small businesses, usage by customer class, any lessons learned from marketing to small businesses, and any lessons learned in small business usage of the DC fast charger. Due to the particular characteristics of small business EV usage, the lessons learned from the Liberty CalPeco arena would be helpful in designing future programs.

2. Small Business Charger Installation Rebate Program

Liberty CalPeco's creation of a priority review project that will directly target small business EV engagement is beneficial to ratepayers and the small business community. The program will provide a rebate of up to \$2,500 for the first 100 customers that enroll in and meet the requirements of the program.¹³ Small businesses constitute approximately 10% of Liberty CalPeco's customer base¹⁴ and encompassing this segment into their TE programs will be an important step in the electrification process.

i. Marketing, Education, and Outreach

Liberty CalPeco will utilize mail inserts that will be sent to small businesses in the territory, providing information about the program and asking small businesses to consider being a host site for the EV charging stations.¹⁵ The Small Business Charger Installation Rebate Program presents an excellent opportunity for the Liberty CalPeco to pilot various strategies for engaging all customer classes, including exploring how to market and reach the small business

¹³ *Id.* at p. 11.

¹⁴ SBUA-Liberty-1, question 1.

¹⁵ SBUA-Liberty-1, question 4.

community. Given Liberty CalPeco’s currently modest rate of EV adoption in its region,¹⁶ a robust marketing campaign will be crucial in increasing awareness. Given this, SBUA recommends a targeted marketing and education strategy, for example, sending repeated messages across various media channels to penetrate through to the small business community.

ii. Data Gathering, Metrics, and Evaluation.

In their data responses, Liberty CalPeco noted they would track the number of small businesses that apply to the program, the location, cost of the equipment and installation for each installation, number and dollar amounts of rebates requested and issues, and number of visitors to the customer online resource program.¹⁷ As the program develops, Liberty CalPeco plans to generate and include additional data.¹⁸ This targeted rebate program and detailed metrics satisfy the goals of promoting widespread TE, expanding to diverse customer segments, and is beneficial to ratepayers and small businesses.

B. Bear Valley’s Proposals

Through their application, Bear Valley intends to address two of the most common barriers to TE: (1) the limited range an EV can travel, and (2) lack of charging infrastructure.¹⁹ Through its pilot programs and infrastructure projects, they aim to create a “virtuous cycle of EV and infrastructure adoption.”²⁰ Given that sixty percent of Bear Valley customers are classified

¹⁶ Liberty CalPeco Testimony, Attachment 1, p. 1 (describing that the “deployment of electric vehicles in Tahoe-Truckee to date has been modest, but promising.”).

¹⁷ SBUA-Liberty-1, question 6.

¹⁸ *Id.*

¹⁹ *Application of Golden State Water Company on Behalf Of Its Bear Valley Electric Service Division (U 913-E) For Approval Of Its 2017 Transportation Electrification Proposals*, June 30, 2017 (“Bear Valley Application”), p. 6.

²⁰ *Id.* at p. 7.

as part time residents,²¹ small businesses will be more consistently participating and will be important in driving TE deployment forward in Bear Valley’s service territory.

1. Destination Make-Ready Rebate Pilot

The Destination Make-Ready Rebate Pilot will provide rebates to eligible commercial customers (up to fifty and up to five per site) for make-ready EV charging infrastructure installations and a requirement to enroll in separate metered EV TOU rates. This pilot is beneficial to small businesses.

i. Data Gathering and Analysis

The data collection and measurement metrics that Bear Valley include are detailed and inclusive. Metrics on the outreach, education, and marketing toward the small business community include:

- Number of customers/businesses reached through each outreach channel (meetings, direct outreach, online); and
- Google Analytics of all online marketing campaigns to identify what audience is being reached.²²

Bear Valley will “review carefully lost opportunities to recruiting customers and review what barriers prevented customer and contractor participation in the pilot project” and “[t]he successful pilot project will be one where all reasonable measures were taken to recruit customer an contractors onto the pilot project.”²³ In addition, the methods will be evaluated in an “ongoing cycle through the pilot period” and “[c]ontinued efforts can be targeted to reach businesses or

²¹ *Id.* at p. 9 (citing the Bear Valley Electric Service *Integrated Resource Plan 2016 – 2024* at p. 10).

²² Appendix 3, SBUA Data Requests to Bear Valley, Set One (“SBUA-Bear Valley-1”), question 7.

²³ *Id.*

geographic areas that [Bear Valley] underrepresented in initial rounds of outreach.”²⁴

In addition to the above detailed metrics, SBUA recommends that Bear Valley measure: (1) small business participation in contracting opportunities as part of the program, and (2) provide lessons learned in marketing and outreach to small businesses in their annual report. These metrics can be used for future programs that are similar in nature to help inform how the design can promote competition and small business participation. Overall, SBUA appreciates Bear Valley’s thoughtful and ongoing assessment of their marketing and outreach plan toward small businesses in promoting widespread TE.

ii. Competition Issues

Through their Make-Ready Rebate Pilot, Bear Valley intends to provide jobs through the recommended local installer list and pilot program participation opportunities to Big Bear residents and businesses.²⁵ To ensure that new market participants are included, SBUA recommends that Bear Valley create a system for routinely updating the reference list of contractors and electricians.²⁶

In providing rebates, SBUA recommends that Bear Valley set a non-binding goal of selecting 20% of the rebates for small businesses. The small business community often face low EV adoption rates, and so both the small business community and the State’s air quality goals will benefit from promoting small commercial participation in TE programs. By providing a non-binding goal of at least 20% of the rebates targeted toward small businesses, they will receive a necessary boost toward EV deployment.

²⁴ *Id.*

²⁵ Bear Valley Application, p. 2.

²⁶ *Id.* at p. 15.

2. EV- TOU Rate Pilot Program

In its standard review proposal, Bear Valley will test separately metered residential and commercial EV-TOU rates through the pilot program.²⁷ SBUA supports Bear Valley's inclusion of multiple customer classes, specifically the delineation for the EV-TOU-2 class in the program. Recognizing that different commercial customers may have different load sizes given their fleet and usage is important in allowing fair treatment of various sizes of small commercial customers. Bear Valley's commercial EV-TOU pilot is highly beneficial to these ratepayers as the utility considers how to incorporate future charging needs by the small business sector.

i. Marketing, Education, and Outreach

Bear Valley will do the following to reach out to small businesses and those affected by the commercial TOU Rate:

- Bill inserts to all commercial customers;
- Attendance and presentations at Big Bear Chamber of Commerce or other business groups, distributing materials at these events. Materials include EV-TOU sell-sheet and information packet custom specific to destination;
- Ads in local media;
- Resources available on BVES website; and
- Dedicated email address monitored by program staff.²⁸

Bear Valley has indicated consideration of distributing materials to individual targeted businesses. SBUA supports this proposal. In addition, in the case of effectively reaching the small business community, multiple and repeated messages across various channels may be

²⁷ Bear Valley Application, p 11.

²⁸ SBUA-Bear Valley-1, question 2.

necessary to effectively disseminate their message.

ii. Data Gathering

Given the exploratory nature of the TE program, SBUA finds that measuring and evaluating the success of these marketing and outreach strategies as much as possible to be helpful in creating future programming. Bear Valley has created a robust data gathering strategy and will measure the following information in their pilot program:

- Number of customers that signed up for the new EV-TOU rates, and size/type of business;
- Number of unique users number of charging sessions, duration of charging events, total kilowatt-hour (kWh) consumption;
- A database tracking all potential pilot program participants solicited during the education and outreach phase; and
- Google Analytics of all online marketing campaigns to identify what audience is being reached.²⁹

In measuring the number of charging sessions, duration of charging events, and total kWh hours, Bear Valley indicates this data could be segmented to analyze charging events and small compared to large businesses.³⁰ SBUA recommends that Bear Valley to do so in an effort to create a fuller profile of the small business community. Finally, SBUA recommends that the annual report include a section on lessons learned regarding participation in the pilot from the small business community in the Bear Valley region.

²⁹ *Id.* at question 4.

³⁰ *Id.*

iii. Rate Design

SBUA entered into a joint stipulation with Bear Valley and the Office of Ratepayer Advocates to modify the program as follows:

- Flatten the on-peak, off-peak, and super off-peak rates for the program;
- Modify the TOU time periods; and
- Increase the energy usage maximum of the EV-TOU-2 customers class to a maximum of 50 kW instead of 20 kW in regards to non-coincident demand charges.³¹

Given that TOU rates can be confusing for small businesses who are limited in their time and resources, becoming used to high on peak schedules or a wide gap between the rates can be confusing and burdensome. Through the joint stipulation, the EV-TOU design will allow greater participation in the EV-TOU-2 rate and create a friendlier TOU rate for small commercial participants. This stipulation is in the public interest and promotes widespread TE by encouraging participation in the EV-TOU rate from the small business community.

C. PacifiCorp's Proposals

PacifiCorp proposes two priority review TE programs: (1) the Outreach and Education Program, and (2) the Demonstration and Development Program.³² With some modifications, SBUA supports the two programs in their efforts to increase awareness of EV options and promote creative TE grant proposals in the PacifiCorp region. SBUA notes that the Commission has directed the utilities to target non-infrastructure as well as infrastructure pilots and programs

³¹ Appendix 4, *Joint Motion of Bear Valley Electric Service (U 912-E), A Division of Golden State Water Company, The Office of Ratepayer Advocates, And Small Business Utility Advocates to Enter A Joint Stipulation Into the Record And For An Expedited Ruling*, Dec. 8, 2017.

³² *Application of PacifiCorp (U 901 E) For Approval Of Its 2017 Transportation Electrification Programs*, June 30, 2017 ("PacifiCorp Application"), p. 1.

and that the proposals should experiment in diverse market segments to inform the eventual design of scaled programs that will be crucial to substantial reductions in GHG and pollutants from the transportation sector.³³ Utilities are uniquely positioned to take the lead in advancing TE across various market segments, including in the small business community. PacifiCorp does not include an infrastructure proposal in their TE programs, which SBUA believes would be beneficial in advancing widespread TE across customers segments.

1. Outreach and Education Program

PacifiCorp's intended goal in their Outreach and Education Program is to increase awareness of EV options and the idea of introducing EVs to their daily lives or business.³⁴ Currently, EV penetration in the primarily rural service territory is low.³⁵ PacifiCorp's Outreach and Education Program will test the effectiveness of different outreach tactics on accelerating TE through four distinct program components: (1) Customer Communications, (2) Self-Service Resources and Tools, (3) Technical Assistance, and (4) Community Events.

i. Marketing, Education, and Outreach Issues

Small business owners often wear multiple hats in running their businesses and have limited time and resources to stay up to date on the latest regulatory changes in California. This, combined with the low adoption rate in the region, may result in small businesses facing particular challenges in considering EV options. A robust marketing, education, and outreach strategy should be implemented to both address and learn about specific barriers.

³³ *Assigned Commissioner's Ruling Regarding The Filing Of The Transportation Electrification Applications Pursuant To Senate Bill 350*, Nov. 14, 2016 ("ACR"), p. 19.

³⁴ PacifiCorp Application, p. 3.

³⁵ *Id.* at Ex. PAC/100, p. 4 ("PacifiCorp's California service territory is rural with small pockets of population" and "TE has been slow to take hold in the Company's California service territory").

Under the proposed Technical Assistance Component,³⁶ PacifiCorp intends to develop a network of qualified consultants to counsel non-residential customers considering EVSE projects on their options.³⁷ SBUA supports this proposal. Given that small businesses often do not have the same resources as larger companies to dedicate time to researching the latest energy updates or utility programs, SBUA finds that marketing and outreach in this component on the following two fronts will be important: (1) promoting contracting opportunities to small business EVSE installers as part of the procurement process,³⁸ and (2) alerting small businesses in the service territory on the program. On the procurement front, SBUA suggests one additional tweak and recommends piloting additional methods of outreach to potential EVSE installers to broaden the EVSE installer options to qualified small businesses.

Providing resources on EV options—such as the Self Service Resources and Tools and Community Events—are helpful, but only if customers know they are available and use them. Small businesses face constraints on their time and do not readily shift focus away from the day to day of running their core business. Given this, SBUA recommends that PacifiCorp consider using this opportunity to create a targeted marketing and outreach strategy for all four components of the program that are designed to increase awareness of EVs in the small business community. For example, PacifiCorp could consider a strategy of repeated messaging to small businesses across many media channels to both alert them to the available programs and educate them on their features.

³⁶ PacifiCorp Application, p. 3.

³⁷ *Id.* at Ex. PAC/101, p. 6.

³⁸ *Ibid.*

ii. Data Gathering, Metrics, and Evaluation

As its program currently stands, PacifiCorp does not intend to report on participation by specific customer group in its final report, although they will “look for opportunities to present findings by customer segment if they provide meaningful insight into program performance, learnings, or potential modification expansion.”³⁹ PacifiCorp noted in their data request response that their ability to track participation for specific customer designations would vary by program component⁴⁰ and also be determined by which contractors and tools are selected.⁴¹ SBUA believes that the burden should be on the utility to effectively target all the customers classes in their region in TE advancement.

The transportation electrification programs and mandate from SB 350 present an opportunity to learn lessons on what strategies work to effectively promote EV adoption in the small business community. For example, given that small business have shown low engagement in other renewable energy adoption, it is important their participation in EV adoption is a priority. In their data request response, PacifiCorp noted that customer communications would be “distributed broadly across PacifiCorp’s customers, though certain messages may be targeted at specific customer groups, enabling more detailed reporting.”⁴² Given that small business make

³⁹ Appendix 5, SBUA Data Requests to PacifiCorp, Set One (“SBUA-PacifiCorp-1”), question 3 (In response to a question on how PacifiCorp will track small business participation on the (1) utilization of electric resources, event attendance, and participation in technical assistance services in their reports to the Commission).

⁴⁰ *Id.* at question 2.

⁴¹ *Id.* at question 2 (Where PacifiCorp responds to a question regarding Customer Communication component, but appears to include the rest of the TE proposals as well).

⁴² SBUA-PacifiCorp-1, question 2.

up over 17% of the service territory,⁴³ and that they likely face unique challenges that are different from larger commercial customers, SBUA recommends that small businesses be considered a specific group to be targeted.

PacifiCorp also noted that they typically track and report program activity by major customer class (e.g. residential, commercial, industrial) and do not plan to measure program success based on the ability of the program to reach specific customer groups beyond these high-level customer classes.⁴⁴ Given the Commission’s directive that TE proposals should experiment in diverse market segments to inform the eventual programs,⁴⁵ PacifiCorp should ensure that the small business community is fully integrated into its programs. To appropriately inform the eventual design of the scaled programs that will be crucial to address substantial reductions in criteria air and GHG pollutants, the utilities should have a robust strategy of data gathering and analysis on small business participation and SBUA recommends several enhancements.

PacifiCorp should track the success of all four components of the program in the small business sector: (1) the number of small businesses that are targeted by component, (2) the number of small businesses who participate in each component, and (3) lessons learned from the marketing, education, and outreach strategy with regard to small businesses.

Under the Self-Service Resources and Tools Program, PacifiCorp intends to “assess the costs and expected reach in determining whether to contract for these services,” if the bidders decide to “propose tools that target specific customer groups.”⁴⁶ However, PacifiCorp has not

⁴³ SBUA-PacifiCorp-1, question 1.

⁴⁴ *Id.* at question 5.

⁴⁵ ACR, p. 19.

⁴⁶ SBUA-PacifiCorp-1, question 7.

proposed detailed metrics on their own that would target the small business community. The risk of waiting until contractors and tools are selected without clear metrics beforehand is that the appropriate metrics end up not being tracked. Instead of declaring a broad intention of future assessment, PacifiCorp should specify listed targets with a set time for future evaluation, such as at the program halfway mark. SBUA recommends setting clear metrics that measure small business participation, such as measuring the (1) number of small business visitors to the site, and (2) the number of small business contractor partners, before contractors and tools are selected to ensure fulfillment of SB 350 goals in diverse market segments.

2. Demonstration and Development Program

i. Program Design

In the Demonstration and Development program, PacifiCorp will award competitive grant funding to non-residential customers to encourage development of creative and customer-driven TE projects in its territory to address market barriers.⁴⁷ PacifiCorp intends to prioritize governments entities and nonprofits in their grant awards.⁴⁸ By limiting grant winners in this way, small businesses may feel discouraged to participate. In light of this, SBUA recommends a non-binding goal of 20% in selecting grant winners from small business applicants, some of which may also be nonprofit organizations. PacifiCorp will not be soliciting input from stakeholders or the Commission on specific awards,⁴⁹ and so providing a non-binding carve out will encourage commercial customers to participate in this program. As the program is only open to non-residential customers, welcoming small commercial customers to in its application process

⁴⁷ PacifiCorp Application, p. 4.

⁴⁸ *Id.*, Ex. PAC/100, p. 12.

⁴⁹ PacifiCorp Application, Ex. PAC/100, p. 13.

would broaden the perspectives of the applicants and help contribute to future program design.

PacifiCorp stated its preference for government entities and nonprofits for the purpose of encouraging community-driven projects and decreasing the likelihood of program funding going to businesses with sufficient resources to implement these projects. While most of the grant funding will likely be directed toward government entities and non-profit organizations, small businesses may observe and present a different project unique to their experience. In addition, many small businesses would not be able to fund such a pilot on their own. The non-binding goal would allow the selection of the grants to be based on merit, but would highlight and encourage small businesses to participate in this self-described creative and customer-driven non-residential TE program.

ii. Marketing, Education, and Outreach Issues

The outreach and marketing of the program is thoughtful and includes outreach to many economic development councils and chambers of commerce in the PacifiCorp territory.⁵⁰ In addition, PacifiCorp will broadcast the grant proposals through the varied networks of the economic development councils themselves. In light of the robust marketing and outreach to commercial customers, creating a focus on small businesses through the non-binding goal could further encourage participation of the program.

IV. CONCLUSION

SBUA generally supports all of PacifiCorp, Liberty CalPeco's, and Bear Valley's priority review and standard review proposals for transportation electrification. As small commercial customers represent a considerable customer segment in all three of these utilities' service territories, promoting the programs with incentive structures and partnerships with these smaller

⁵⁰ SBUA-PacifiCorp-1, question 11.

commercial ratepayers is an important element to maximizing the benefits of their proposal, especially as they will be costing ratepayers hundreds of thousands of dollars.

SBUA therefore requests that the Commission require that the TE proposals be modified, as discussed above, to include additional focus and direction toward this important customer segment. This concludes my opening testimony.

APPENDIX 1

**STATEMENT OF QUALIFICATIONS
FOR LILLIAN RAFII**

Lillian Rafii is a member of the Board of Directors at Small Business Utility Advocates (SBUA) and has served in that position for the since 2015. In that capacity, she has advised and worked with SBUA to develop its various policy and expert positions on behalf of small commercial customers in proceedings before the California Public Utilities Commission.

Ms. Rafii received her law degree in 2013 from the University of Illinois, College of Law, Champaign, Illinois and bachelor's degree in political science in 2008 from the University of California, Berkeley, California. Prior to joining SBUA's board, Ms. Rafii's experience includes representing Communities for a Better Environment in 2014 with large scale energy litigation, and from 2014-2017 she worked on civil matters at the firm of Rutledge & Rutledge, Santa Cruz, CA. In addition, Mr. Rafii has prior experience with energy matters as a Research Associate in 2012 at Energy Biosciences Institute, an organization dedicated to promoting renewal fuel sources. She is currently a member of the Asian Pacific American Bar Association of Silicon Valley and serves on the Women in Law Committee.

APPENDIX 2

**SBUA Data Requests to Liberty CalPeco, Set One
(Selected Questions)**

1. What percentage of customers in Liberty CalPeco's service territory qualify as small businesses? How many customers does that come to?

Response: Liberty CalPeco currently has 5,054 small business customers, which makes up approximately 10% of our total customer base.

Priority Review – DC Fast Charger Project

3. (a) Please provide information on how the RFP bid process for equipment will target vendors. (Referenced on page 9.)

Response: Liberty CalPeco will send out RFPs for equipment, software, service, and installation to the top EV charging equipment suppliers in the industry.

Priority Review - Small Business Charger Installation Rebate Program

4. Please provide what steps Liberty CalPeco will take in marketing and advertising to small businesses regarding this program?

Response: Liberty will utilize mail inserts that will be sent to small businesses in our service territory, providing information about the program and asking small businesses to consider being a host site for the EV charging stations.

Priority Review - Small Business Charger Installation Rebate Program

6. Please provide the information, data, and measurements that will be provided in the annual reports. For example, will outreach and interactions with small business customers be tracked and evaluated? (Referenced on pages 3 and 4.)

Response: Liberty CalPeco's annual report will provide data such as number of residents, small businesses that apply to the program, and their locations, cost of the equipment and installation for each installation, number and dollar amount of rebates requested and issued, and number of visitors to the customer online resource program. As we develop the program, additional data will be generated and included in the annual report.

Priority Review - Small Business Charger Installation Rebate Program

7. Please provide information on if any differences exist to how the site hosts pays for EV charging compared to the public users who pay for public charging. For example, do site hosts receive a bill for their charging, or do they pay immediately for charging at the station?

Response: Liberty CalPeco envisions working with major equipment vendors for EV charging stations. Most of these vendors require customers to have some type of account and charge card that provides customer access to the charging station. The equipment provider will manage all billing services to the customer, site owner, and Liberty CalPeco.

APPENDIX 3

**SBUA Data Requests to Bear Valley, Set One
(Selected Questions)**

Q2. Please provide any specific direct customer communication, education, and outreach planned toward small businesses regarding the TOU-EV-2 and TOU-EV-3 rates. (Referenced on pages 11, 16, and Appendix F.)

Response:

- Bill inserts to all commercial customers, including small businesses
- Attendance / presentations at Big Bear Chamber of Commerce or other business groups, distributing materials at these events
 - Materials include EV-TOU sell-sheet and information packet custom specific to destination
 - Additional materials can be distributed to individual targeted businesses.
- Ads in local media
- Resources available on BVES website
- Dedicated email address monitored by program staff

Q4. Please provide any specific metrics, data, or focus group studies that will be evaluated regarding or related to small businesses in the data collection and reporting of the temporary EV TOU rates. (Referenced on pages 10, 29-30, and Appendix F.)

Response:

BVES will be conducting load research to assess the impact of the TE program by EV TOU rate class on added hourly sales. The study will provide insight as to the timing of the sales as it compares to the BVES system load. Also BVES will be reviewing the price sensitivity to hourly charging behavior. Because the small business (A1 rate classes) are located throughout the BVES service area, BVES is interested in the locations that adapted the charging stations and what the timing of the charging usage is for these locations. This will enable BVES to access the demands on the distribution system as well as the demands on BVES supply requirements for the system as a whole. Rate design for the permanent TOU rates for EV charging stations at these locations will require the detail load research data analytics to properly determine the energy rates required to recover all costs associated with EV charging stations.

Demographic, economic, and marketing data collection via surveys and focus groups will enable BVES to improve on the assessment of the EV charging TOU rates and the barriers that exists that diminish customer usage of EVs as opposed to other petro fueled vehicles. There is a wide variety of attributes within the 6,000,000 annual visitors to BVES. Understanding these differences as it pertains to BVES charging patterns at the

small business locations will benefit BVES planning and rate initiatives. BVES service area being in a mountain region, 6,800 feet above sea level and yet within 2 to 3 hours from San Diego, LA, Las Vegas, and the coastal region of Southern California provides a perfect market test for EV usage for recreational destinations. Also, BVES will closely study the small business results of this program because of the convenient locations throughout the BVES service areas that the small business provides for EV charging stations.

Also the following information will be collected during the pilot project.

- Direct outreach activities give the opportunity to inform potential participants about the program as well as answer questions and gather feedback for participating small businesses. Other metrics and data that will be tracked include
- Number of customers that signed up for the new EV TOU rates, and size/type of business
- Number of unique users, number of charging sessions, duration of charging events, total kilowatt-hour (kWh) consumption
 - This data could be segmented to analyze charging events and small vs large businesses.
- A database tracking all potential pilot program participants solicited during the education and outreach phase.
 - Database can track business type and size
 - The database will include reasons for why they did or did not participate in the new EV TOU rates
- Google Analytics of all online marketing campaigns to identify what audience is being reached

Q7. Please provide how Bear Valley will measure and evaluate success to outreach, education, and marketing to the small business community? (Referenced in Appendix F.)

Response:

- The ultimate measure of program success is the number of destination make-ready installations completed
- Outreach metrics include:
 - Number of customers/businesses reached through each outreach channel (meetings, direct outreach, online),
 - Google Analytics of all online marketing campaigns to identify what audience is being reached

BVES will review carefully lost opportunities to recruiting customers and review what barriers prevented customer and contractor participation in the pilot project. The successful pilot project will be one where all reasonable measures were taken to recruit customers and contractors into the pilot project.

- Q8. (a) Please provide information on how Bear Valley will collect data for the database tracking all potential pilot program participants. (Referenced on page 17.)
- (b) How will this program solicit and reach small businesses to participate in pilots?

The methods described above will be executed in ongoing cycle through the pilot period. After initial round of outreach, results will be evaluated to influence further outreach efforts. Continued efforts can be targeted to reach businesses or geographic areas that we underrepresented in initial rounds of outreach. All outreach will be focused on the benefits of providing charging and the value proposition for businesses to host charging infrastructure.

APPENDIX 4

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

Application of PacifiCorp (U 901 E) for Approval of its 2017 Transportation Electrification Programs.

Application No. 17-06-031

Application of Liberty Utilities (CalPeco Electric) LLC (U 933 E) for Approval of its 2017 Transportation Electrification Proposals

Application No. 17-06-033

Application of Golden State Water Company on behalf of its Bear Valley Electric Service Division (U 913 E) for Approval of its 2017 Transportation Electrification Proposals.

Application No. 17-06-034

**JOINT MOTION OF BEAR VALLEY ELECTRIC SERVICE (U 913-E), A DIVISION
OF GOLDEN STATE WATER COMPANY, THE OFFICE OF RATEPAYER
ADVOCATES, AND SMALL BUSINESS UTILITY ADVOCATES TO ENTER A JOINT
STIPULATION INTO THE RECORD AND FOR AN EXPEDITED RULING**

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December 8, 2017

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

Application of PacifiCorp (U 901 E) for Approval of its 2017 Transportation Electrification Programs.	Application No. 17-06-031
Application of Liberty Utilities (CalPeco Electric) LLC (U 933 E) for Approval of its 2017 Transportation Electrification Proposals	Application No. 17-06-033
Application of Golden State Water Company on behalf of its Bear Valley Electric Service Division (U 913 E) for Approval of its 2017 Transportation Electrification Proposals.	Application No. 17-06-034

JOINT MOTION OF BEAR VALLEY ELECTRIC SERVICE (U 913-E), A DIVISION OF GOLDEN STATE WATER COMPANY, THE OFFICE OF RATEPAYER ADVOCATES, AND SMALL BUSINESS UTILITY ADVOCATES TO ENTER A JOINT STIPULATION INTO THE RECORD AND FOR AN EXPEDITED RULING

In accordance with Article 11 of the California Public Utilities Commission (“Commission”) Rules of Practice and Procedure, Bear Valley Electric Service (“BVES”), a division of Golden State Water Company, the Office of Ratepayer Advocates (“ORA”), and Small Business Utility Advocates (“SBUA”) (collectively the “Moving Parties”), hereby move to enter the December 8, 2017 Stipulation between Bear Valley Electric Service (U 913-E), a division of Golden State Water Company, Office of Ratepayer Advocates, and Small Business Utility Advocates Regarding Electric Vehicle Time-of-Use Rates and Time-of-Use Periods for the Proposed Electric Vehicle Time-of-Use Pilot Program (“Stipulation”) into the record in the instant consolidated proceedings, A.17-06-031 et al.¹ The Stipulation is attached to this motion

¹ In accordance with Rule 1.8(d), BVES has been authorized to submit this joint motion on behalf of ORA, and SBUA, and others.

as Appendix A. BVES reached out to all other parties in the proceeding and received no objections or concerns regarding this motion or the Stipulation.² Accordingly, the Moving Parties also request that the response deadline to this motion be shortened so an expedited ruling on this motion can be issued. This will help parties narrow and tailor discussions in written testimony and will help to streamline and advance the proceeding expeditiously.

BVES hereby requests the Commission to take the following actions:

- to enter the December 8, 2017 Stipulation between Bear Valley Electric Service (U 913-E), a division of Golden State Water Company, Office of Ratepayer Advocates, and Small Business Utility Advocates Regarding Electric Vehicle Time-of-Use Rates and Time-of-Use Periods for the Proposed Electric Vehicle Time-of-Use Pilot Program into the record in this proceeding; and
- to shorten the time for responses to this motion to 3 days from the date of this motion.

Dated: December 8, 2017

Respectfully submitted,

/s/

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Attorney for Bear Valley Electric Service

² On December 6, 2017, BVES sent an email to GreenLots, Southern California Edison Company (“SCE”), and San Diego Gas & Electric Company (“SDG&E”) (the other active parties to A.17-06-031 and related, consolidated proceedings) notifying them of the intention to submit the Stipulation. GreenLots and SCE notified BVES that they do not oppose the Stipulation. SDG&E had not responded to BVES’ email at the time of this filing. (It should also be noted that ChargePoint, Inc., the other party in this proceeding, informed BVES that it will no longer be actively participating in the proceeding.)

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

Application of PacifiCorp (U 901 E) for Approval of its 2017 Transportation Electrification Programs.	Application No. 17-06-031
Application of Liberty Utilities (CalPeco Electric) LLC (U 933 E) for Approval of its 2017 Transportation Electrification Proposals	Application No. 17-06-033
Application of Golden State Water Company on behalf of its Bear Valley Electric Service Division (U 913 E) for Approval of its 2017 Transportation Electrification Proposals.	Application No. 17-06-034

[PROPOSED] RULING

On December 8, 2017, Bear Valley Electric Service (“BVES”), a division of Golden State Water Company, the Office of Ratepayer Advocates (“ORA”), and Small Business Utility Advocates (“SBUA”) (collectively the “Moving Parties”), filed a motion (“Joint Motion”) to enter the December 8, 2017 Stipulation between Bear Valley Electric Service (U 913-E), a division of Golden State Water Company, Office of Ratepayer Advocates, and Small Business Utility Advocates Regarding Electric Vehicle Time-of-Use Rates and Time-of-Use Periods for the Proposed Electric Vehicle Time-of-Use Pilot Program (“Stipulation”) into the record in the instant consolidated proceedings.

As described by the Moving Parties in their Joint Motion, the Stipulation, if accepted into the record, will help parties narrow and tailor discussions in written testimony and will help to streamline and advance the proceeding expeditiously.

The Moving Parties also request an expedited response time to their Joint Motion. The Moving Parties state that no other parties to this proceeding object to the Joint Motion or take issue with the Stipulation.

IT IS RULED that:

1. The Joint Motion Of Bear Valley Electric Service (U 913-E), A Division Of Golden State Water Company, The Office Of Ratepayer Advocates, Small Business Utility Advocates To Enter A Joint Stipulation Into The Record And For An Expedited Ruling is granted.
 - a. The Stipulation is entered into the record of this proceeding.
 - b. Responses to the Joint Motion shall be filed within 3 days of the date of the Joint Motion.

Dated _____, 2017 at San Francisco, California

Administrative Law Judge

APPENDIX A

**STIPULATION BETWEEN BEAR VALLEY ELECTRIC SERVICE (U 913-E), A
DIVISION OF GOLDEN STATE WATER COMPANY, OFFICE OF RATEPAYER
ADVOCATES, AND SMALL BUSINESS UTILITY ADVOCATES REGARDING
ELECTRIC VEHICLE TIME-OF-USE RATES AND TIME-OF-USE PERIODS FOR
THE PROPOSED ELECTRIC VEHICLE TIME-OF-USE PILOT PROGRAM**

STIPULATION BETWEEN BEAR VALLEY ELECTRIC SERVICE (U 913-E), A DIVISION OF GOLDEN STATE WATER COMPANY, OFFICE OF RATEPAYER ADVOCATES, AND SMALL BUSINESS UTILITY ADVOCATES REGARDING ELECTRIC VEHICLE TIME-OF-USE RATES AND TIME-OF-USE PERIODS FOR THE PROPOSED ELECTRIC VEHICLE TIME-OF-USE PILOT PROGRAM

Bear Valley Electric Service (“BVES”), a division of Golden State Water Company, the Office of Ratepayer Advocates, and Small Business Utility Advocates (collectively the “Parties”) stipulate that BVES’ proposed electric vehicle time-of-use (“EV TOU”) pilot program should utilize the EV TOU rates and EV TOU periods specified below. The stipulated terms reflect reasonable modifications to BVES’ EV TOU pilot program proposed in the June 30, 2017 Application of Golden State Water Company on Behalf of its Bear Valley Electric Service Division (U 913-E) for Approval of its 2017 Transportation Electrification Proposals (“Application”).

I. EV TOU Rates

A. Non-Coincident Demand Charges

Parties agree that non-coincident demand charges should only apply to commercial electric vehicle (“EV”) accounts that exceed 50 kilowatts (“kW”) in demand.

B. New EV TOU Rates

Parties agree that the following rates should be used for the EV TOU program:

Proposed TOU Period	Proposed TOU Rate		
	TOU-EV-1	TOU-EV-2	TOU-EV-3
Summer			
On-peak	\$0.18149	\$0.18149	\$0.18149
Off-peak	\$0.13612	\$0.13612	\$0.13612
Super Off-peak	\$0.09074	\$0.09074	\$0.09074

Proposed TOU Period	Proposed TOU Rate		
Winter			
On-peak	\$0.31446	\$0.31446	\$0.31446
Off-peak	\$0.12704	\$0.12704	\$0.12704
Super Off-peak	\$0.09074	\$0.09074	\$0.09074

II. EV TOU Periods

Parties agree that the following EV TOU periods should be utilized:

Proposed TOU Period	Start	End
Summer	1-May	31-Oct
On-peak	4:00 PM	10:00 PM
Off-peak	10:00 PM	9:00 AM
Super Off-peak	9:00 AM	4:00 PM
Winter	1-Nov	30-Apr
On-peak	5:00 PM	11:00 PM
Off-peak	11:00 PM	9:00 AM
Super Off-peak	9:00 AM	5:00 PM

III. Limitations

The Parties agree that this stipulation applies only to the Commission’s consideration of BVES’ proposed EV TOU pilot proposal in its Application. This stipulation does not bind or limit any of the Parties from presenting different proposals or taking different positions on issues related to the EV TOU pilot proposal that may be considered elsewhere.

Dated: December 8, 2017

/s/ Jedediah J. Gibson

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APPENDIX 5

A.17-06-031 / PacifiCorp

December 5, 2017

SBUA Data Request 1

SBUA Data Request 1

What percentage of customers in PacifiCorp's service territory qualify as small businesses? How many customers does that come to?

Response to SBUA Data Request 1

17.37 percent of PacifiCorp's California service territory customers qualify as small business. This equates to 8,178 customers.

Despite PacifiCorp's diligent efforts, certain information protected from disclosure by the attorney-client privilege or other applicable privileges or law may have been included in its responses to these data requests. PacifiCorp did not intend to waive any applicable privileges or rights by the inadvertent disclosure of protected information, and PacifiCorp reserves its right to request the return or destruction of any privileged or protected materials that may have been inadvertently disclosed. Please inform PacifiCorp immediately if you become aware of any inadvertently disclosed information.

A.17-06-031 / PacifiCorp

December 5, 2017

SBUA Data Request 2

SBUA Data Request 2

Please provide any metrics, data, reporting, or analytics that will specifically measure small business participation in the Customer Communications, Self-service Resources, Community Events, and Technical Assistance Program. (Referenced on pages Morris/5 and Morris/6.)

Response to SBUA Data Request 2

The ability to track participation for specific customer designations will vary by program component. For technical assistance, PacifiCorp will have information on all recipients of services, enabling more granular tracking and reporting, as appropriate. For self-service resources and community events, PacifiCorp's ability to track and report by customer group will be determined as contractors and tools are selected. Customer communications will tend to be distributed broadly across PacifiCorp's customers, though certain messages may be targeted at specific customer groups, enabling more detailed reporting.

Despite PacifiCorp's diligent efforts, certain information protected from disclosure by the attorney-client privilege or other applicable privileges or law may have been included in its responses to these data requests. PacifiCorp did not intend to waive any applicable privileges or rights by the inadvertent disclosure of protected information, and PacifiCorp reserves its right to request the return or destruction of any privileged or protected materials that may have been inadvertently disclosed. Please inform PacifiCorp immediately if you become aware of any inadvertently disclosed information.

A.17-06-031 / PacifiCorp
December 5, 2017
SBUA Data Request 3

SBUA Data Request 3

Outreach and Education Program

Please provide any information on how PacifiCorp intends to track the participation of small businesses for the (1) utilization of electronic resources, (2) event attendance, and (3) participation in technical assistance services in their report to the Commission after the program period? (Referenced on page Morris/14.)

Response to SBUA Data Request 3

PacifiCorp does not currently plan to report on participation by specific customer groups in its final report. However, PacifiCorp will look for opportunities to present findings by customer segment if they provide meaningful insight into program performance, learnings, or potential modification or expansion.

Despite PacifiCorp's diligent efforts, certain information protected from disclosure by the attorney-client privilege or other applicable privileges or law may have been included in its responses to these data requests. PacifiCorp did not intend to waive any applicable privileges or rights by the inadvertent disclosure of protected information, and PacifiCorp reserves its right to request the return or destruction of any privileged or protected materials that may have been inadvertently disclosed. Please inform PacifiCorp immediately if you become aware of any inadvertently disclosed information.

A.17-06-031 / PacifiCorp

December 5, 2017

SBUA Data Request 5

SBUA Data Request 5

Component 1 – Customer Communications:

How will PacifiCorp measure success of the direct customer communication and paid advertising in regards to reaching small businesses?

Response to SBUA Data Request 5

PacifiCorp typically tracks and reports program activity by major customer class (e.g., residential, commercial, industrial) and does not plan to measure program success based on the ability of the program to reach specific customer groups beyond these high-level customer classes.

SBUA Data Request 7

Component 2 – Self-Service Resources and Tools:

Please describe how PacifiCorp's TE online resources and contract for development online tools will target small businesses as opposed to other customer segments.
(Referenced on page Morris/5)

Response to SBUA Data Request 7

PacifiCorp intends to contract for, and deploy online resources that provide value to customers broadly, however, bidders will be welcome to propose tools that target specific customer groups. If such targeted tools are proposed, the Company will assess the costs and expected reach in determining whether to contract for these services.

SBUA Data Request 11

Demonstration and Development Program:

Please provide how PacifiCorp will ensure the engagement of small business customers in submitting grant proposals for TE projects. (Referenced on page 5 and page Morris/9.)

Response to SBUA Data Request 11

As detailed in Exhibit No. PAC/102, PacifiCorp plans to engage potential grant applications through the following activities:

- Host application materials and additional applicant resources online,
- Encourage interested parties to join the funding cycle notification list, and
- Build awareness through industry groups, Pacific Power's Regional Business Manager and Pacific Power's communication channels (e.g. media outreach, website, brochures, newsletters).

Specific engagement channels within this strategy that are likely to reach small businesses include:

- Outreach to local chambers of commerce.
- Partnership with local economic development organizations, including Siskiyou County Economic Development Council, a leader in transportation electrification planning, outreach, and education to small businesses in PacifiCorp's California service area.
- Outreach to Jefferson Economic Development Institute
- Outreach to Great Northern Services, a community development non-profit serving PacifiCorp's California service area.
- Outreach to Siskiyou Training and Employment Program.