

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

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

Rulemaking 18-12-006  
(Filed December 13, 2018)



May 30, 2019

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**INFORMAL COMMENTS OF THE UTILITY CONSUMERS' ACTION NETWORK  
(UCAN) ON THE CPUC WORKSHOP FOR "METRICS & METHODOLOGIES TO  
EVALUATE TRANSPORTATION ELECTRIFICATION PROGRAMS."**

The CPUC held a workshop on May 9, 2019 to discuss the current data collection and reporting efforts and potential strategies to improve the IOUs' TE program evaluation methodologies to ensure the ratepayer-funded investments are supporting the state's SB 350 goals. Data reporting templates for IOUs' SB 350 TE programs were posted to the CPUC website and discussed in the workshop. UCAN's comments below discuss concerns with data collection and budget controls.

**I. DATA COLLECTION AND METRICS**

UCAN thanks the CPUC and the speakers for sharing the information provided at the May 9 workshop. UCAN offers these comments on the workshop content to inform the CPUC's future work in TE, especially in Docket R.18-12-006, in which UCAN is an intervenor.

**A. Concerns Regarding Data Collection Problems**

At the workshop, there was discussion around problems related to EV charging data collection. These included:

- The additional cost to collect data, and whether the data collection itself is value-added
- The proprietary nature of some data and resulting lack of availability to the public
- The lack of a central data repository, and the cost/effort to create one

UCAN is concerned about these problems and the lack of solutions offered for these problems during the workshop. UCAN recommends the upcoming Energy Division Transportation Electrification Framework (TEF) draft<sup>1</sup> provide some guidance around addressing these issues, including the following:

- Standards to ensure data is not collected needlessly and the cost of the collection is justified
- Data labeling standards such that data can be shared with minimum effort
- Clarity on what data can and should be made publicly available regarding a program in order for it to qualify for public funding

#### **B. Data Collection for the Grid: Incentivizing Daytime Charging**

Transportation system design and operation involves many stakeholders. For TE to be successful, the grid must adapt to supply the additional demand while continuing to provide a reliable supply of electricity for all purposes on which people depend on it. The California IOUs and CPUC are uniquely positioned to take leadership roles in managing the cost of grid upgrades to support demand from EVs. How consumers are incentivized to charge their EV's will be an important part of managing costs.

One way of managing costs is to look at when EV's are charged. For example, all EVs have onboard batteries making them storage devices. As such, there is flexibility to charge the vehicles whenever they are not in use in order to meet later transportation needs. Private vehicles

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<sup>1</sup> Scoping Memo and Ruling of Assigned Commissioner (Scoping Memo) issued on May 2, 2019 at pp. 2-7.

for personal use typically also spend the vast majority of their lifespan in park, creating opportunities to charge the vehicles during times when it is cost-advantageous to do so. This includes incentivizing daytime charging so that vehicles can be charged when solar energy is abundant. UCAN recommends that data collection efforts by IOUs focus on collecting data that shows how charging costs or other incentives change consumer behavior on vehicle charging as opposed to just collecting data on how people choose to charge vehicles now.<sup>2</sup> The end goal would be programs that lead to more optimal vehicle charging to reduce the cost of grid upgrades and new generation.

### **C. Data Collection: Focus on Emissions Benefits**

Emissions reduction benefits underlie public support for further TE. UCAN recommends focusing data collection on metrics that show how public dollars reduce emissions through TE. This should include consideration of emissions created by electric power generation and how such emissions vary by season and time of day. UCAN recommends standard methodologies for such calculations be discussed in the upcoming Staff TE Framework.

## **II. DATA REPORTING TEMPLATES**

UCAN reviewed the data collection and reporting templates for the SB 350 TE programs. UCAN is encouraged to see that the templates include data on prices paid for charging by end users as well as hourly profile and charging session data. This would be helpful in determining how such pricing influenced behavior as discussed above. UCAN also notes that the instructions state that the “utilities should consult with each other and the CPUC Energy Division to develop

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<sup>2</sup> See Slide 12 of Dr. Austin Brown’s presentation at the May 9 workshop provides an example of this. Figure 11 on this slide shows home consumption pattern differences with and without time-of-use rates.

consistent calculation methodologies” for emissions reductions and looks forward to learning what methodologies are developed.

### **III. PROJECT PLANNING AND BUDGET CONTROL**

A slide in CARB’s presentation noted that, “Project planning is critical and can help control the budget.”<sup>3</sup> UCAN has consistently expressed concerns about TE project costs and the effects on rates. For example, in A.14-04-014<sup>4</sup>, UCAN opposed SDG&E’s original application for 550 EV site installations and 5,500 EV charging stations. UCAN argued that the proposed pilot program with a \$65 million start-up budget was too large and too expensive.<sup>5</sup> The Commission ultimately lowered the size and cost of the program to 350 EV site installations and 3,500 EV charging stations with a start-up budget limit of \$45 million.<sup>6</sup> However, at a recent Program Advisory Council meeting to update stakeholders on Power Your Drive and the SB 350 Priority Review Projects (held May 22, 2019 at SDG&E office park in San Diego), it was reported that the Power Your Drive program was \$25 million dollars over budget. Several stakeholders, including UCAN, expressed concern about this figure and whether ratepayers or shareholders would be responsible for these cost over-runs.

The Commission has approved twenty-two SB 350 Priority Review Projects for six IOU’s at nearly \$50 million dollars.<sup>7</sup> UCAN has serious concerns about project planning and budget controls. If multiple projects experience cost over-runs such as seen in the SDG&E Power Your Drive program, ratepayers and/or shareholders could suffer the consequences.

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<sup>3</sup> See Slide 22 of CARB presentation at May 9 workshop by Joshua Cunningham and Yachun Chow, “Lessons Learned (1)”.

<sup>4</sup> A.14-04-014, filed April 11, 2014, was originally known as the “Electric Vehicle Grid Integration Pilot Program” and later became known as the “Power your Drive” program.

<sup>5</sup> See A.14-04-014 UCAN Opening Testimony pp. 6-8 and D.16-01-045 at p. 82 detailing UCAN’s position.

<sup>6</sup> See D.16-01-045, Finding of Fact #67.

<sup>7</sup> See Slide 3 of Energetics presentation at May 9 workshop by Ziga Ivanic, “IOU Priority Review Projects (PRPs).”

UCAN recommends that the upcoming Energy Division Staff TEF draft (see fn.1 above) include metrics on how to plan and control the budgets for TE investments projects, including who is responsible for covering the costs for projects that go over-budget.

UCAN appreciates the opportunity to file these informal comments.

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Respectfully Submitted,

By: \_\_\_\_\_/s/\_\_\_\_\_

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