

January 10, 2023

CPUC Energy Division Tariff Unit
505 Van Ness Avenue
San Francisco, California 94102
EDTariffUnit@cpuc.ca.gov

Re: Response of the Vehicle Grid Integration Council to Advice Letter 6778-E of Pacific Gas and Electric Company: EV Submetering Implementation Plan

Dear Sir or Madam:

Pursuant to the provisions of General Order 96-B and the extension granted by Administrative Law Judge (“ALJ”) Brian Korpics in the November 15, 2022 email ruling, the Vehicle Grid Integration Council (“VGIC”) hereby submits this response to the above-referenced Advice Letter 6778-E of Pacific Gas and Electric Company (“PG&E”), *EV Submetering Implementation Plan* (“Advice Letter”) on January 10, 2023.

VGIC commends PG&E’s efforts in developing a thorough implementation plan. VGIC supports the Advice Letter; however, we provide additional context for PG&E’s consideration as it implements submetering. VGIC recommends that Energy Division approve the Advice Letter without delay, as VGIC’s below recommendation can be addressed during implementation and in subsequent efforts undertaken by PG&E to support EV submetering in its territory.

I. THE ELECTRIC SCHEDULE TO BE ESTABLISHED FOR THE OPTIONAL DAY-AHEAD REAL-TIME RATE (“DAHRTP”) MUST CONSIDER SUBMETERING ELIGIBILITY UNDER DECISION 21-11-017.

The Advice Letter proposes tariff changes to implement submetering within the following tariffs:

- Electric Rules 9, 11, 16, 18, and 29
- Electric Schedules BEV, EV2, NEM, and NEM2¹

VGIC generally supports enabling submetering through revisions to the above-listed rules and rate schedules. Regarding tariffs that PG&E will soon establish, the Advice Letter further states:

¹ Advice Letter at 18.

“As demand for submetering scales up and PG&E launches additional EV rates (e.g., PG&E’s Commercial Electric Vehicle Day-Ahead Hourly Real Time Price rate (DAHRTP-CEV RTP), PG&E will assess the opportunity to incorporate additional EV rates for submetering, and potentially create new rates for customers billed through a submeter as part of our normal course of business.”²

Meanwhile, Decision (“D.”) 21-11-017 *Authorizing PG&E to Implement an Optional Day-Ahead Real Time Rate for Commercial EV Customers*, or “DAHRTP,” states the following:

“We find that when submetering becomes an approved and accepted means of metering commercial EVSE load, then a separate meter should no longer be required to take service on a BEV rate. This applies to all eligible BEV rate customers including those enrolled on the DAHRTP rate.”³

VGIC recognizes that PG&E has not yet established a tariff for the DAHRTP rate. Therefore, it is reasonable that PG&E did not list DAHRTP alongside the other tariff revisions in the Advice Letter. However, VGIC recommends that PG&E ensure the DAHRTP tariff sheet does incorporate submetering eligibility, per D.21-11-017. In other words, under D.21-11-017, PG&E *must* incorporate DAHRTP for submetering once that new rate schedule or rider is made available.

II. CONCLUSION.

VGIC appreciates the opportunity to submit this response to the Advice Letter and looks forward to collaborating with the Commission and stakeholders in this proceeding.

Respectfully submitted,

/s/ Zach Woogen

Zach Woogen

Senior Policy Manager

VEHICLE GRID INTEGRATION COUNCIL

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² Advice Letter at 9.

³ D.21-11-017 at 31.