

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 4114-E of San Diego Gas & Electric Company: Establishment of the Plug-In Electric Vehicle Submetering Protocol Implementation Plan Pursuant to Decision (D.) 22-08-024

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 4114-E of San Diego Gas & Electric Company (“SDG&E”), *Establishment of the Plug-In Electric Vehicle Submetering Protocol Implementation Plan Pursuant to Decision (D.) 22-08-024* (“Advice Letter”) on January 10, 2023.

VGIC commends SDG&E’s efforts in developing a thorough implementation plan. VGIC supports the Advice Letter; however, we provide additional context for SDG&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 SDG&E to support EV submetering in its territory.

I. SDG&E SHOULD ADD ELECTRIC SCHEDULE EV-TOU-5 TO ITS LIST OF RULES AND RATE SCHEDULES REQUIRING REVISION UNDER D.22-08-024.

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

- Electric Rules 16, 19, and 45
- Electric Schedules EV-TOU, TOU-M, and EV-HP¹

VGIC generally supports enabling submetering through revisions to the above-listed rules and rate schedules. For residential customers, in addition to EV-TOU, VGIC also recommends SDG&E

¹ Advice Letter at 4.

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permit customers using submetering to enroll in EV-TOU-5. Customers may wish to choose this rate, which utilizes a basic service fee and lower TOU prices, over EV-TOU. However, without submetering permitted, EV-TOU-5 customers would have to expose all of their load, including both EV load and non-EV load, to the TOU price signals intended to shift EV charging. VGIC recommends SDG&E enable submetering for EV-TOU-5, so customers can elect to participate in this rate using only their approved EVSE submeter, rather than their home master meter.

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

cc: Greg Anderson (GAnderson@sdge.com & SDGETariffs@sdge.com)
Service list R.18-12-006