

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

Application of Pacific Gas and Electric Company  
(U39M) for Approval of its Proposal for a Day-Ahead  
Real Time Rate and Pilot to Evaluate Customer  
Understanding and Supporting Technology.

Application 20-10-011  
(Filed October 23, 2020)

**REPLY COMMENTS OF THE VEHICLE GRID INTEGRATION COUNCIL ON  
PROPOSED DECISION AUTHORIZING PACIFIC GAS AND ELECTRIC COMPANY  
TO IMPLEMENT AN OPTIONAL DAY-AHEAD REAL TIME RATE FOR  
COMMERCIAL ELECTRIC VEHICLE CUSTOMERS**

Ed Burgess  
Senior Policy Director

Zach Woogen  
Policy Specialist

**Vehicle Grid Integration Council**  
2150 Allston Way, Suite 400  
Berkeley, CA 94704  
Telephone: (510) 665-7811  
Email: [vgicregulatory@vgicouncil.org](mailto:vgicregulatory@vgicouncil.org)

November 15, 2021

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

Application of Pacific Gas and Electric Company  
(U39M) for Approval of its Proposal for a Day-Ahead  
Real Time Rate and Pilot to Evaluate Customer  
Understanding and Supporting Technology.

Application 20-10-011  
(Filed October 23, 2020)

**REPLY COMMENTS OF THE VEHICLE GRID INTEGRATION COUNCIL ON  
PROPOSED DECISION AUTHORIZING PACIFIC GAS AND ELECTRIC COMPANY  
TO IMPLEMENT AN OPTIONAL DAY-AHEAD REAL TIME RATE FOR  
COMMERCIAL ELECTRIC VEHICLE CUSTOMERS**

In accordance with the Rules of Practice and Procedure of the California Public Utilities Commission (“Commission”), the Vehicle Grid Integration Council (“VGIC”) hereby submits these reply comments on the *Proposed Decision (“PD”) Authorizing Pacific Gas and Electric Company (“PG&E”) to Implement an Optional Day-Ahead Real Time Rate (“DAHRTP”) for Commercial Electric Vehicle Customers*, issued on October 18, 2021.

**I. VGIC SUPPORTS ENVIRONMENTAL DEFENSE FUND’S  
RECOMMENDATION FOR TAILORED OUTREACH TO SPECIFIC  
CUSTOMER SEGEMENTS.**

In opening comments on the PD, Environmental Defense Fund (“EDF”) recommends that PG&E “pursue tailored outreach to effectively recruit customers into the rate, track approaches used and the subsequent responses to price signals, as well as the extent to which customers stay on the rate, and evaluate which methods are most effective.”<sup>1</sup> Specifically, EDF reiterates its recommendation that PG&E recruit rate adopters in at least 10 customer segments with a minimum

---

<sup>1</sup> EDF’s Opening Comments at 3.

of 1,000 drivers, and that the enrollment target be approximately 100 customers per segment.<sup>2</sup> EDF offers specific segments that may be suitable for tailored outreach, including public sector fleets, public transportation, medium duty delivery, medium duty agricultural, transportation network companies, heavy-duty transit/deliver nodes, public/workplace charging, community choice aggregators, and recreational facilities/residential developments. VGIC believes that customers in each of these segments could benefit from PG&E's DAHRTP rate, but may lack awareness of the rate itself or how to take advantage of potential benefits. A customer-centric education and outreach approach could help to meaningfully increase enrollment and promote VGI more broadly by tailoring outreach to specific customer segments. As such, we support EDF's recommended outreach framework, including the proposed Ordering Paragraphs found in Appendix A of EDF's opening comments on the PD.

**II. VGIC AGREES THAT THE SAME RATIONALE USED TO EXPAND THE PROPOSED PILOT TO AN OPTION RATE SHOULD APPLY EQUALLY TO EXPANDING THE OPTIONAL RATE TO RESIDENTIAL CUSTOMERS.**

In opening comments on the PD, Enel X states that the PD appropriately modifies the proposed pilot to expand the initial proposed pilot to an optional rate.<sup>3</sup> Enel X adds that the record of this proceeding and the rationale cited by the PD should support expanding the optional rate to residential electric vehicle ("EV") customers, as well. VGIC is generally supportive of Enel X's recommendation that the rate be expanded to residential EV customers. VGIC believes expanding rate eligibility will promote VGI for this important and growing customer class. VGIC supports the proposed ordering paragraph revision in Appendix A of Enel X PD comments. However, if the Commission does not consider the record related to this issue to be developed enough to make

---

<sup>2</sup> *Ibid.*

<sup>3</sup> Enel X's Opening Comments at 1.

this determination, VGIC recommends that further consideration of expanding the rate to residential EV customers be scoped into Phase 2 of this application. Notably, VGIC also recommended in our opening comments on the PD that Phase 2 of the application consider how to compensate V2G exports under the optional rate.<sup>4</sup> VGIC believes that Phase 2 of this application is the appropriate venue to address both of these issues in the near-term, however, we are available to engage in any other policy forum that the Commission deems appropriate to address these issues. At a minimum, the Commission should detail in the PD whether these issues will be addressed in Phase 2 of this application or should specify in which proceeding they will be addressed.

**III. IT IS UNCLEAR WHY THE SUBMETERING PROTOCOL PENDING APPROVAL IN RULEMAKING 18-12-006 WOULD BE WHOLLY INAPPLICABLE TO COMMERCIAL CUSTOMERS, OR WHY EXTENSIVE ADDITIONAL WORK WOULD BE NECESSARY TO ADVANCE SUBMETERING FOR COMMERCIAL CUSTOMERS.**

In opening comments on the PD, PG&E argues that submetering will require more than initial approval of protocols and standards, stating:

“Due to the greater scale and complexity of non-residential EV, the residential EV submetering protocols cannot be used as is. Once that residential protocol is approved, PG&E plans to work on creating a non-residential submetering protocol that will also need to undergo review and approval from the CPUC.”<sup>5</sup>

As illustrated by this comment, PG&E intends to conduct additional work to create a non-residential submetering protocol. However, it is not clear to VGIC why the pending submetering protocol would be wholly inapplicable to commercial customers, or why extensive additional work would be necessary to advance submetering for commercial customers. Given the importance of unlocking submetering pathways for all EV customers, including commercial customers, VGIC

---

<sup>4</sup> VGIC’s Opening Comments at 3.

<sup>5</sup> PG&E’s Opening Comments at 12.

believes that the Commission should consider how to leverage the pending submetering protocol for commercial customers. Notably, the PD states “this decision recognizes the role that submetering can play in resolving the issues faced by PG&E and customers that would otherwise be required to install a separate meter to enroll in the DAHRTP rate.”<sup>6</sup> It is unclear to VGIC why a wholly new, separate effort is needed to develop a commercial submetering protocol that is substantially different from the protocol currently under consideration in Rulemaking 18-12-006. Furthermore, it is unclear to VGIC what PG&E means when referring to the “greater scale and complexity” for non-residential EV customers, such that these customers require a substantially different submetering protocol, and respectfully request that PG&E provide more information to support this assertion.

With this in mind, VGIC supports the proposed approach in the PD to no longer requiring a separate meter to take service on a BEV rate once submetering is approved. VGIC commends the Commission for finding that, “this applies to all eligible BEV rate customers including those enrolled on the DAHRTP rate.”<sup>7</sup>

#### IV. CONCLUSION.

VGIC appreciates the opportunity to submit these reply comments. We look forward to further collaboration with the Commission and stakeholders on this initiative.

Respectfully submitted,



---

<sup>6</sup> PD at 23.

<sup>7</sup> *Ibid.*

Edward Burgess  
Senior Policy Director  
**Vehicle-Grid Integration Council**

November 15, 2021