

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

Application of Southern California Edison  
Company (U338E) for Approval of Its Charge  
Ready and Market Education Programs

Application 14-10-014  
(Filed October 30, 2014)

**SETTLING PARTIES' JOINT COMMENTS ON PROPOSED DECISION AND  
ALTERNATE PROPOSED DECISION MODIFYING AND ADOPTING JOINT  
SETTLEMENT AGREEMENT ON APPLICATION OF SOUTHERN CALIFORNIA  
EDISON COMPANY (U-338 E) FOR APPROVAL OF ITS CHARGE READY AND  
MARKET EDUCATION PROGRAMS**

Dated: **January 4, 2016**

JANET S. COMBS  
ANDREA L. TOZER  
Attorneys for  
SOUTHERN CALIFORNIA EDISON  
COMPANY  
2244 Walnut Grove Avenue  
Post Office Box 800  
Rosemead, California 91770  
Telephone: (626) 302-6713  
Facsimile: (626) 302-7740  
E-mail: [Andrea.Tozer@sce.com](mailto:Andrea.Tozer@sce.com)

OFFICE OF RATEPAYER ADVOCATES  
505 Van Ness Ave.  
San Francisco, CA 94102  
Telephone: (415) 703-1477  
Email: [iak@cpuc.ca.gov](mailto:iak@cpuc.ca.gov)

THE UTILITY REFORM NETWORK  
785 Market Street, Suite 1400  
San Francisco, CA 94103  
Telephone: (415) 929-8876  
Email: [etorres@turn.org](mailto:etorres@turn.org)

[Continued]

ENVIRONMENTAL DEFENSE FUND

123 Mission Street, 28th Floor  
San Francisco, CA 94105  
Telephone: (415) 293-6093  
Email: [lkoehler@edf.org](mailto:lkoehler@edf.org)

CHARGEPOINT, INC.

1692 Dell Avenue  
Campbell, CA 95008  
Telephone: (917) 523-1813  
Email: [Colleen.Quinn@chargepoint.com](mailto:Colleen.Quinn@chargepoint.com)

AMERICAN HONDA MOTOR CO., INC.

1919 Torrance Blvd.  
Torrance, CA 90501  
Telephone: (310) 781-4865  
Email: [Jessalyn\\_ishigo@ahm.honda.com](mailto:Jessalyn_ishigo@ahm.honda.com)

THE GREENLINING INSTITUTE

1918 University Ave., 2nd Floor  
Berkeley, CA 94704  
Telephone: (510) 926-4000  
Email: [joele@greenlining.org](mailto:joele@greenlining.org)

NRG ENERGY, INC.

11390 W. Olympic Blvd., Ste. 250  
Los Angeles, CA 90064  
Telephone: (310) 954-2905  
Email: [kevin.lee@nrg.com](mailto:kevin.lee@nrg.com)

SIERRA CLUB

50 F Street NW, 8th Floor  
Washington, DC 20001  
Telephone: (202) 650-6080  
Email: [joe.halso@sierraclub.org](mailto:joe.halso@sierraclub.org)

CALSTART

501 Canal Boulevard, Suite G  
Richmond, CA 94804  
Telephone: (510) 307-8774  
Email: [jboesel@calstart.org](mailto:jboesel@calstart.org)

THE COALITION OF CALIFORNIA  
UTILITY EMPLOYEES

601 Gateway Blvd., Ste. 1000  
South San Francisco, CA 94080  
Telephone: (650) 589-1660  
Email: [jmauldin@adamsbroadwell.com](mailto:jmauldin@adamsbroadwell.com)

GENERAL MOTORS, LLC

3050 Lomita Blvd.  
Torrance, CA 90505  
Telephone: (310) 257-3756  
Email: [alexander.keros@gm.com](mailto:alexander.keros@gm.com)

THE NATURAL RESOURCES  
DEFENSE COUNCIL

111 Sutter St., 20th Floor  
San Francisco, CA 91404  
Telephone: (415) 875-6100  
Email: [mbaumhefner@nrdc.org](mailto:mbaumhefner@nrdc.org)

PLUG IN AMERICA

2370 Market St., #419  
San Francisco, CA 94114  
Telephone: (415) 323-3329  
Email: [Jay@PlugInAmerica.org](mailto:Jay@PlugInAmerica.org)

VOTE SOLAR

360 22nd Street, Suite 730  
Oakland, CA 94612  
Telephone: (415) 817-5064  
Email: [JBaak@VoteSolar.org](mailto:JBaak@VoteSolar.org)

**SETTLING PARTIES’ JOINT COMMENTS ON PROPOSED DECISION AND ALTERNATE  
 PROPOSED DECISION MODIFYING AND ADOPTING JOINT SETTLEMENT  
 AGREEMENT ON ITS APPLICATION FOR APPROVAL FOR APPROVAL OF ITS CHARGE  
 READY AND MARKET EDUCATION PROGRAMS**

**TABLE OF CONTENTS**

<b><u>Section</u></b>	<b><u>Page</u></b>
I. INTRODUCTION .....	1
II. DISCUSSION .....	2
A. The Settling Parties Accept the Proposed Rebate Structure in the APD and Recommend a Minor Clarification. ....	2
B. The Settling Parties Recommend Providing the Additional Reporting Information Requested in the PD and APD to the Extent Feasible. ....	4
C. The Settling Parties Recommend that the PD and APD Be Modified to Clarify the Advisory Board and Energy Division Roles. ....	4
D. The Settling Parties Recommend that Load Management Metrics Be Determined in Consultation with the Advisory Board, not Prescribed in a Commission Decision. ....	5
E. If the Commission Does Not Support the Settling Parties’ Recommendation Above and Choses to Prescribe Metrics at this Time, Modifications are Necessary.....	6
F. The Settling Parties Clarify that Vendor Requirements Are Based on Technical Criteria.....	11
G. The Settling Parties Support Additional Contractor Requirements with Minor Clarifications.....	11
H. SCE Clarifies that Technical and Energy Efficiency Vendor Requirements Have Been Submitted to Energy Division.....	12
I. The Settling Parties Recommend Minor Modifications to the Funding Authorization Language in the PD and APD.....	12
J. Disadvantaged Communities Should Be Defined Pursuant to CalEnviroScreen 2.0. ....	13
III. CONCLUSION.....	14
APPENDIX A SETTLING PARTIES' RECOMMENDED REVISIONS TO THE PD AND APD	

**SETTLING PARTIES’ JOINT COMMENTS ON PROPOSED DECISION AND ALTERNATE  
 PROPOSED DECISION MODIFYING AND ADOPTING JOINT SETTLEMENT  
 AGREEMENT ON ITS APPLICATION FOR APPROVAL FOR APPROVAL OF ITS CHARGE  
 READY AND MARKET EDUCATION PROGRAMS**

**TABLE OF AUTHORITIES**

<b>Authority</b>	<b>Page</b>
<b><u>Legislation</u></b>	
CA Assembly Bill 327 .....	9, 10
CA Senate Bill 1275 .....	13
CA Senate Bill 535 .....	13, 14
<b><u>CPUC Decisions</u></b>	
D.88-12-083 .....	2
D.91-05-029 .....	2
D.92-12-019 .....	2
<b><u>CPUC Rulemakings</u></b>	
R.14-08-013 .....	9
<b><u>CPUC Rules of Practice and Procedure</u></b>	
Rule 1.8 .....	1
Rule 12.1 .....	2
Rule 14.3 .....	1
<b><u>Other Authorities</u></b>	
Data Request set A.14-10-014 ED-SCE-003 .....	12

**SETTLING PARTIES' JOINT COMMENTS ON PROPOSED DECISION AND  
ALTERNATE PROPOSED DECISION MODIFYING AND ADOPTING JOINT  
SETTLEMENT AGREEMENT ON APPLICATION OF SOUTHERN CALIFORNIA  
EDISON COMPANY (U-338 E) FOR APPROVAL OF ITS CHARGE READY AND  
MARKET EDUCATION PROGRAMS**

**I. INTRODUCTION**

Pursuant to Rule 14.3 of the Rules of Practice and Procedure of the California Public Utilities Commission (“Commission” or “CPUC”), Southern California Edison Company (“SCE”), on behalf of itself and the other Settling Parties,<sup>1</sup> except CESA,<sup>2</sup> hereby submits these joint comments on the Proposed Decision (“PD”) of Administrative Law Judge (“ALJ”) Farrar and the Alternate Proposed Decision (“APD”) of Commissioner Peterman, issued December 15, 2015, in the above-captioned proceeding.<sup>3</sup>

The Settling Parties continue to support the Settlement Agreement as submitted for Commission approval because it is reasonable in light of the record, consistent with the law, and in the public interest. Furthermore, the Settlement Agreement represents a reasonable compromise of the Settling Parties’ positions. It is also consistent with longstanding Commission decisions favoring settlements, particularly those joined by all major interests in the matter, such as the Settlement Agreement at hand. The Commission should be reluctant to upset such settlements, given the strong

---

<sup>1</sup> The Settling Parties are: SCE; American Honda Motor Co., Inc. (“Honda”); CALSTART; the California Energy Storage Alliance (“CESA”); ChargePoint, Inc.; the Coalition of California Utility Employees (“CCUE”); the Environmental Defense Fund (“EDF”); General Motors, LLC; the Greenlining Institute; the Natural Resources Defense Council (“NRDC”); NRG Energy, Inc. (“NRG”); the Office of Ratepayer Advocates (“ORA”); Plug In America; the Sierra Club; the Utility Reform Network (“TURN”); and Vote Solar.

<sup>2</sup> CESA is not joining these comments because it was unable to obtain approval without a board vote, which could not happen in the procedural time allowed over the holidays. As a party to the Settlement Agreement, CESA previously committed to support approval of the Settlement Agreement without modification. *See* Settlement Agreement, Section 6, p. 13.

<sup>3</sup> Pursuant to Rule 1.8(d), the Settling Parties, except CESA, have authorized SCE to submit these joint comments on their behalf.

public policy favoring them.<sup>4</sup> Therefore, the Settling Parties request that the Commission adopt the Settlement Agreement as submitted, without any modifications.

If, however, the Commission finds that modifications to the Settlement Agreement are warranted, the Settling Parties request the Commission to adopt the APD with certain clarifications and modifications as reflected in Appendix A attached hereto. In general, these changes reflect technical, operational, or typographical corrections. In these comments, the Settling Parties explain the basis for these recommended changes.

Specifically, the Settling Parties recommend:

- That the Commission adopt the Settlement Agreement as submitted without modification.
- If the Commission finds that modifications to the Settlement Agreement are warranted, that the Commission adopt the APD with the specific modifications described herein, including:
  - Clarifying reporting requirements and content, advisory board and energy division roles, technical and contractor requirements, and funding authorization;
  - Ordering that load management metrics be developed in consultation with the advisory board; and
  - Reinstating the CalEnviroScreen 2.0 definition of disadvantaged communities.

## **II. DISCUSSION**

### **A. The Settling Parties Accept the Proposed Rebate Structure in the APD and Recommend a Minor Clarification.**

The most significant difference between the PD and the APD is the rebate level for charging stations in multi-unit dwellings. The APD appropriately recognizes the strong need for, and current

---

<sup>4</sup> See Rule 12.1(d) of the Commission's Rules of Practice and Procedure; D.88-12-083 at p. 56 (*mimeo*), 30 CPUC 2d 189, 221-223; D.91-05-029 at p. 42 (*mimeo*), 40 CPUC 2d 301, 326; D.92-12-019 at p. 8 (*mimeo*), 46 CPUC 2d 538, 553.

lack of, charging infrastructure in multi-unit dwellings.<sup>5</sup> Therefore, the APD proposes to reduce the rebate levels agreed to in the Settlement Agreement to 25% for charging stations not located in disadvantaged communities or multi-unit dwellings, reduce the rebate level to 50% for charging stations located in multi-unit dwellings, and maintain the rebate level at 100% for charging stations located in disadvantaged communities.<sup>6</sup> The PD differs from the APD in proposing to reduce the rebate levels to 25% of base cost for all charging stations not located in disadvantaged communities, including those in multi-unit dwellings.<sup>7</sup>

The Settling Parties support the APD’s finding that a rebate level of 50% is appropriate for charging stations located in multi-unit dwellings participating in the Charge Ready pilot. This finding is supported with references to studies demonstrating that home charging is preferred by electric vehicle drivers and that multi-unit dwellings are underrepresented in the electric vehicle market.<sup>8</sup> Both the PD and the APD acknowledge that the “rebate issue is critical” and strive to strike a balance between insufficient participation in the program due to upfront costs of charging station installation and limiting ratepayer funding.<sup>9</sup> The APD’s higher rebate level for charging stations located in multi-unit dwellings more appropriately balances these interests, is supported by the record, and is closer to the settlement negotiated by almost all parties to the proceeding. The rebate levels proposed in the Settlement Agreement were part of a negotiated settlement among parties with different positions on the need for, and amount of, rebates. The Settling Parties’ comments on this issue relate only to the unique circumstances presented by the PD and APD in this case.

The Settling Parties also recommend a minor clarification be made to the PD and APD

Conclusion of Law 6:

*SCE should use Phase 1 to evaluate whether the adopted rebate levels are appropriate for Phase 2 implementation.*

---

<sup>5</sup> APD, p. 17.

<sup>6</sup> APD, pp. 9, 16-17, & Ordering Paragraph (“OP”) 3 at p. 61.

<sup>7</sup> See PD, OP 3 at p. 61.

<sup>8</sup> APD, p. 14.

<sup>9</sup> PD & APD, p. 15.

**B. The Settling Parties Recommend Providing the Additional Reporting Information Requested in the PD and APD to the Extent Feasible.**

The PD and APD propose that SCE include specific information in its quarterly reports in addition to the reporting proposed in the Settlement Agreement.<sup>10</sup> However, certain additional information, such as detailed information about vendors and base costs, may be confidential or proprietary. SCE will consult with the Advisory Board and incorporate this information in its quarterly reports to the extent it can be made public.<sup>11</sup> Thus, SCE recommends the PD and APD be modified such that the additional information proposed should be provided “unless confidential or proprietary.” In addition, to the extent the Commission needs more information than what would be provided in the public reports, SCE can provide such information to the Energy Division upon request under proper confidentiality protections.

**C. The Settling Parties Recommend that the PD and APD Be Modified to Clarify the Advisory Board and Energy Division Roles.**

The PD and APD find the reporting requirements included in the Settlement Agreement reasonable.<sup>12</sup> However, the PD and APD also state that “SCE will collaborate with the *Advisory Board*, which shall include the Commission’s Energy Division, *who will maintain final authorization* of the content of the pilot report and criteria for pilot evaluation.”<sup>13</sup> This phrasing could potentially imply that the Advisory Board has the authority to approve the pilot report and criteria, rather than Energy Division. Thus, SCE recommends the PD and APD be modified to state that “SCE will collaborate with the Advisory Board, which shall include Energy Division. Energy Division will maintain final authorization of the content of the pilot report and criteria for pilot evaluation.”

---

<sup>10</sup> PD, pp. 22-25; APD, pp. 23-26.

<sup>11</sup> PD, pp. 22-25; APD, pp. 23-26.

<sup>12</sup> PD, p. 22; APD, p. 23.

<sup>13</sup> PD, pp. 21, 24 (emphasis added); APD, pp. 22, 24-25 (emphasis added).



**D. The Settling Parties Recommend that Load Management Metrics Be Determined in Consultation with the Advisory Board, not Prescribed in a Commission Decision.**

The PD and APD propose that SCE work with the Advisory Board to determine the metrics needed to evaluate the effectiveness of load management strategies.<sup>14</sup> The PD and APD also state that the metrics “shall include” seven specific metrics, refined from a list originally proposed by Environmental Defense Fund.<sup>15</sup> While the Settling Parties agree that metrics are valuable and should be tracked, some of these metrics need additional consideration and refinement before they are finalized. SCE will nevertheless collect data as available.

Metrics are typically used to measure and evaluate performance as compared to a baseline. Except as noted below, SCE does not have baseline for the proposed metrics. In particular, charging stations deployed through the pilot will have their own dedicated circuits and their load will be metered separately from any other services at participating sites. As a result, all Charge Ready service accounts will be new accounts with service turned on for the first time upon completion of charging station deployment. Except for a limited number of non-residential customers served under Schedules TOU-EV-3 or TOU-EV-4, SCE does not have access to representative non-residential electric vehicle (“EV”) charging data and may not be able to establish a relevant baseline for comparison with the load created by customers participating in the pilot, though SCE will consider any exogenous data that becomes available.

In addition, SCE’s load management strategies for the pilot rely primarily on requiring that all participating customers take service on a time-of-use (“TOU”) rate and that all Level 2 charging stations have demand response capabilities.<sup>16</sup> As part of the Settlement Agreement, SCE agreed “to create or have identified and adopted a Demand Response Program, as referenced in its opening testimony in this proceeding, within three years of this agreement being adopted by the Commission, subject to any necessary regulatory approvals including cost recovery.”<sup>17</sup> As a result, load

---

<sup>14</sup> PD & APD, p. 39 & OP 12 at pp. 63-64.

<sup>15</sup> PD & APD, OP 12 at pp. 63-64.

<sup>16</sup> See SCE-01, Vol. 2, p. 8, lines 8-10; p. 13, lines 25-26; p. 14, lines 13-15; and Appendix B. See also SCE Response to Assigned Commissioner and ALJ’s Ruling for Comments, filed September 28, 2015, p. 9.

<sup>17</sup> Settlement Agreement, Subparagraph 4.B.8

management during the pilot's term will be primarily influenced by TOU rates applicable to participating customers together with lifestyle and general charging behaviors within each in-scope segment (e.g., workplace charging usually occurs at the beginning of the work day if available).

Finally, the Charge Ready pilot will only deploy a limited number of charging stations within the 12- to 24-month period covered by the pilot report, as directed in Ordering Paragraph 6 of both the PD and APD. While SCE appreciates the need to ensure that such deployment does not adversely affect the grid, no measurable system-wide impact, either positive or negative, can be expected from such a limited deployment. However, it may be feasible to demonstrate managed charging in ways that may be inferred to provide grid level benefits when deploying charging stations at greater scales. For example, EV charging patterns in response to TOU pricing may be compared to EV charging behavior in other utility service territories where other price signals are available (to the extent such charging data is available to SCE). Issues like these should be discussed with the Advisory Board. SCE will consider how to assess the impact of pilot EV charging behavior on grid conditions and operations.

For these reasons, the Settling Parties recommend that all metrics should be discussed and refined with the Advisory Board before being finalized, rather than being adopted as final in the decision. Also, while these metrics may not be fully developed at the time the pilot is initiated and, therefore, may not provide sufficient information during Phase 1, SCE will commit to gathering data as available. If feasible, the scope and methods of gathering data may need to be revised to improve reporting. The metrics may be modified, contingent on the availability of new information, for use in Phase 2.

**E. If the Commission Does Not Support the Settling Parties' Recommendation Above and Choses to Prescribe Metrics at this Time, Modifications are Necessary.**

In the alternative, if the Commission chooses to finalize certain metrics at this time, the Settling Parties recommend that the following modifications be made.

**1. Metric (1) Improved capacity factors for renewable generators:**

The Settling Parties recognize the ability of EVs to potentially improve capacity factors for renewable generators. However, based on the scale of the pilot, SCE does not anticipate that EV charging pursuant to the pilot can measurably improve the capacity factor for renewable generation systems. In addition, as discussed above, baseline data needs to be gathered prior to implementing this metric. It is unclear that sufficient information will exist during the pilot. That said, SCE will endeavor to track behaviors and practices, such as responding to a TOU price signal, as part of the pilot in order to set a baseline and form expectations for future phases with higher penetration of EVs.

If the Commission directs SCE to report on this metric, the Settling Parties request that the reporting requirement be identified as “capacity factors for renewable generators” without the word “improved,” as no baseline exists and no improvement of capacity factors for renewable generators can reasonably be expected from the pilot.

**2. Metric (2) Enablement of customers’ use of Preferred Resources:**

SCE expects that demand response will be the most available preferred resource in the Charge Ready pilot. Participating customers may install photovoltaics and energy storage devices on circuits deployed through the pilot.<sup>18</sup> However, SCE anticipates that most customers will choose to deploy these resources on their primary service account, rather than on the Charge Ready service account. Further, neither SCE’s testimony nor the Settlement Agreement has proposed vehicle-to-grid (V2G) functionality as a technical requirement for qualifying charging stations, due to limited product availability of both V2G-compatible charging stations and electric vehicles. Instead, the pilot requires that charging stations be capable of receiving and responding to demand response signals. The pilot will measure the coincidence of Charge Ready pilot participants who also deploy preferred resources; yet, SCE does not anticipate a high correlation of deployment concurrent with the pilot.

---

<sup>18</sup> At the customer’s cost, subject to all applicable tariffs and rules.

If the Commission directs SCE to report on this metric, the Settling Parties request that this metric be clarified to require tracking only the coincidence of installation of preferred resources with the pilot and that the metric be identified accordingly as “coincidence of customers’ use of Preferred Resources.”

**3. Metric (3) Improved customer load factor:**

Because of the limited scale of the pilot, SCE does not anticipate any impact on the distribution system load factor at the circuit level (where several thousand customers are aggregated) during the pilot period. Measuring a customer’s specific load factor for purposes of the pilot is challenging and has little value for the system. Each customer will have a separate charging station account for the pilot. Consequently, the customer of record for the pilot may differ from the customer of record for the site itself (for example, a property owner/manager may be the customer of record for the pilot and a separate business that operates on the property owner’s site may be the customer of record for the other load at that site). SCE will not have baselines for these customer service accounts to measure “improvement.” Regardless of these challenges, changes to customer load factors have the potential to impact infrastructure only further upstream at the circuit level. At this level, thousands of customers are aggregated. The pilot will be relatively small from a demand perspective, and SCE will not be able to conclude whether any load factor changes result from the pilot or from other customer load fluctuations. SCE will measure the hourly load shape of charging station use at all participating sites and report this information to the Commission and Advisory Board, as well as additional information relevant to this metric, should it become available.

If the Commission directs SCE to report on this metric, the Settling Parties request that this metric be identified accordingly as “Customer Load Factor” without the word “improved,” as no baseline exists and no improved customer load factor can reasonably be expected from the pilot.

**4. Metric (4) Reduction in curtailment of renewable energy:**

While studies have proven potential for using EVs to mitigate the curtailment of renewable generators, the daily variation in generation profiles at this scale of deployment limits the effectiveness of EVs as curtailment options. Most, if not all, of the studies conducted on this issue have utilized both significant penetrations of EVs, as well as geographically clustered electric vehicle charging and renewable generation deployment. In contrast, SCE projects that this pilot will involve EV charging stations dispersed over a wide area with limited existing EV penetration. To the extent feasible, SCE will assess participating customer practices during the pilot that can be extrapolated to larger scales and could potentially result in less curtailment of utility scale renewables – but notes that actual impact may be negligible during the pilot.

If the Commission directs SCE to report on this metric, the Settling Parties request that this metric be identified accordingly as “curtailment of renewable energy” without the words “reduction in,” as no reduction in curtailment of renewable energy can reasonably be expected from the pilot.

**5. Metric (5) Utilization of EVSE:**

The Settling Parties support this metric as written.<sup>19</sup>

**6. Metric (6) Strategic placement of EVs, and as applicable the associated Distributed Energy Resources, consistent with the system locational benefit considerations of Assembly Bill (“AB”) 327 and R.14-08-013:**

The Settling Parties request clarification of the foregoing metric as EVs are usually registered at a residential location, outside of the scope of the pilot, except for multi-unit dwellings. If, instead, the metric should read “electric vehicle supply equipment (EVSE)” or “charging stations” instead of “EVs,” none of the elements pertaining to this metric are included in the eligibility requirements for SCE customers to participate in the pilot. Similar

---

<sup>19</sup> See Settlement Agreement, Appendix A.

to other SCE customer programs, the Charge Ready pilot will enroll customers that meet the eligibility requirements as long as funding is available.<sup>20</sup>

In addition, the Locational Net Benefit Methodology outlined in AB 327 as potentially guiding the deployment of Distributed Energy Resources (“DER”), such as EV charging stations, for strategic system benefit is unlikely to be adopted before the end of the pilot, though SCE will consider such a resource if it becomes available during the pilot.

If the Commission directs SCE to report on this metric, the Settling Parties recommend that this metric only be used as a way to evaluate the effectiveness of load management if sufficient information is available.

7. **Metric (7) Improvement of participation in and effectiveness of complementary Low-Income Programs for eligible Multi-Family Residential (or Multi-Unit Dwelling) customers:**

The proposed pilot is open to non-residential customers only. Residential customers in multi-unit dwellings may be responsible for usage of individual charging stations deployed through the pilot, but they are not eligible to become Customer Participants. The building owners or property managers of the multi-unit dwellings will be the actual Customer Participants. The Settling Parties ask the Commission to clarify in the final decision that measuring and reporting the participation of the foregoing residential customers in Low-Income Programs and comparing this participation to the uptake rate of the general residential customer population in similar programs will satisfy the proposed requirement.

If the Commission directs SCE to report on this metric, the Settling Parties request that this metric be identified accordingly as “participation in complementary Low-Income Programs for eligible Multi-Family Residential (or Multi-Unit Dwelling) customers” without the words “improvement” and “effectiveness,” as participating customers will be non-residential customers only and improving participation in and effectiveness of complementary

---

<sup>20</sup> SCE may deny a customer’s request to participate in the pilot if the customer and SCE cannot agree upon an installation configuration and location that is reasonably cost-effective as determined by SCE in its sole discretion. See SCE-01, Vol. 2, p. 12, lines 15-17.

Low-Income Programs for eligible residential customers is out of the pilot’s objectives and scope.

**F. The Settling Parties Clarify that Vendor Requirements Are Based on Technical Criteria.**

The PD and APD propose that SCE “ensure that the Vendors and service providers it qualifies include those that provide vehicle charging that allows alternative vehicle ownership models (including car sharing).”<sup>21</sup> The Settlement Agreement’s proposed requirements place no limitations on alternative vehicle ownership models—vendors must only meet technical requirements. As such, the Settlement Agreement’s proposed requirements will allow alternative vehicle ownership models as long as the technical requirements are met.

**G. The Settling Parties Support Additional Contractor Requirements with Minor Clarifications.**

The PD and APD propose that, in addition to the requirements included in the Settlement Agreement, electricians be certified by the Electric Vehicle Infrastructure Training Program (“EVITP”).<sup>22</sup> The Settling Parties support this additional requirement with the corrections to Section 3.14 of the PD and APD described below.

*To ensure that the ~~SCE and IBEW licensed~~ contractors install electric vehicle infrastructure safely, ~~they~~ the electricians must receive certification from the Electric Vehicle Infrastructure Training Program (EVITP). The EVITP, which is supported by the U.S. Department of Energy, ~~identifies~~ certifies electricians that have been safely trained to perform EV infrastructure work.*

These first corrections are needed because (a) contractors are licensed by the State of California, not SCE or the IBEW (this is the California C-10 license requirement), and (b) the EVITP trains and certifies the electricians who perform the work rather than the contractor (employer) who

---

<sup>21</sup> PD & APD, p. 43.

<sup>22</sup> PD & APD, p. 47. The EVITP is a product of national collaboration by automakers, charging infrastructure suppliers, electrical contractors, and the IBEW. See the EVITP website, available at <http://www.evitp.org/> [as of January 4, 2016]. As the PD and the APD note, the program is recognized by the U.S. Department of Energy. See the U.S. Department of Energy’s “Clean Cities” web page, available at <http://www2.eere.energy.gov/cleancities/evitp.html> [as of January 4, 2016].

hires them. The second correction is needed because it is the actual electrician certification by the EVITP that ensures that each electrician is qualified to perform the work safely.

**H. SCE Clarifies that Technical and Energy Efficiency Vendor Requirements Have Been Submitted to Energy Division.**

The PD and the APD state that “SCE must provide the Energy Division and the Advisory Board the final technical standards and energy efficiency recommendations that it will use to determine rebate-eligible EVSE.”<sup>23</sup> SCE has initiated its qualification process to prepare for the potential approval of the Charge Ready pilot. For several months, SCE has been evaluating vendors and charging stations. A copy of the confidential Request for Information used to qualify vendors and charging stations was provided the Energy Division on February 27, 2015, through Data Request set A.14-10-014 ED-SCE-003. This document includes SCE’s technical requirements to determine rebate-eligible EVSE, including energy efficiency requirements, and has not been revised. SCE plans to update the technical requirements regularly to incorporate lessons learned from the qualification process and new standards. SCE will resubmit the current requirements, or submit future updates, to the Energy Division upon request.

**I. The Settling Parties Recommend Minor Modifications to the Funding Authorization Language in the PD and APD.**

The PD and APD propose authorizing SCE to recover Phase 1 revenue requirements associated with up to \$22 million (\$2014) of capital and O&M expenditures in the Charge Ready Program Balancing Account.<sup>24</sup> The Settling Parties support this authorization and recommend the following minor changes to Ordering Paragraphs 1 and 6 such that the PD and APD provide clear funding authorization:

Ordering Paragraph 1

*The Southern California Edison Company is authorized to recover the revenue requirements associated with up to \$22 million (\$2014) of capital and O&M*

---

<sup>23</sup> PD & APD, pp. 46-47.

<sup>24</sup> PD & APD, OP 1 & 6 at pp. 61-62.



*expenditures for implementation of Phase 1 of its Charge Ready and Market Education Programs.*

Ordering Paragraph 6

*The terms in the Settlement filed July 9, 2015, regarding cost management and program suspension are modified such that SCE is authorized to establish a Charge Ready Balancing Account, using the standard commercial paper rate, to record the authorized revenue requirements associated with costs, up to \$22 million (\$2014) of capital and O&M expenditures, of its Charge Ready and Market Education Programs. Costs shall be reviewed in SCE's annual Energy Resource Recovery Account application.*

**J. Disadvantaged Communities Should Be Defined Pursuant to CalEnviroScreen 2.0.**

The PD and the APD modify the Settlement Agreement “such that disadvantaged communities are defined on a service territory basis and not on a statewide basis.”<sup>25</sup> SCE’s service territory includes about 3,100 census tracts, approximately 960 (or about 31%) of which qualify as Disadvantaged Communities according to CalEPA’s CalEnviroScreen 2.0 tool, pursuant to Senate Bill (“SB”) 535. As noted, the top quartile (top 25% highest scoring) CalEnviroScreen 2.0 scored census tracts are identified as Disadvantaged Communities for purposes of SB 535.<sup>26</sup> By determining the top quartile of census tracts based on SCE’s service territory, the PD and the APD actually direct SCE to qualify about 765 census tracts as Disadvantaged Communities, eliminating approximately 200 census tracts that would otherwise qualify under CalEPA’s statewide definition.

Moreover, the service territory-based definition of Disadvantaged Communities does not align with state programs (e.g., SB 1275) that currently provide EV incentives and financing assistance to low- and moderate-income drivers.<sup>27</sup> Scrap and replace programs that provide low-income drivers a

---

<sup>25</sup> PD, OP 4 at p. 61; APD, OP 4 at pp. 61-62.

<sup>26</sup> See California Environmental Protection Agency, “Designation of Disadvantaged Communities Pursuant to Senate Bill 535 (De Leon),” October 2014, *available at* <http://www.calepa.ca.gov/EnvJustice/GHGInvest/Documents/SB535DesCom.pdf> [as of January 4, 2016].

<sup>27</sup> See Charge Ahead California, “Charging Ahead to One Million Electric Vehicles for All Californians,” December 2015, *available at* <http://chargeahead.org/content/uploads/2015/12/Charge-Ahead-Factsheet-Leading-with-Equity-Dec-2015.pdf> [as of January 4, 2016]; *see also* the Replace Your Ride website, *available at* <https://www.replaceyourride.com/> [as of January 4, 2016].

voucher of up to \$9,500 to purchase a new or used plug-in hybrid electric vehicle or pure-battery electric vehicle are only available to drivers living in Disadvantaged Community census tracts identified by CalEnviroScreen 2.0, pursuant to SB 535. To ensure charging infrastructure in low-income communities is used and useful, charging station deployment should be prioritized in those Disadvantaged Communities identified pursuant to SB 535.

The Settling Parties urge the Commission to approve the use by SCE of the broader statewide approach (in accordance with CalEnviroScreen 2.0) as supported by the Settlement Agreement, instead of the narrower service territory definition.

### **III. CONCLUSION**

The Settling Parties appreciate the opportunity to provide these comments and urge the Commission to adopt the APD with the modifications proposed herein and in Appendix A hereto.

Respectfully submitted,

JANET S. COMBS  
ANDREA L. TOZER

*/s/ Andrea L. Tozer*

By: Andrea L. Tozer<sup>28</sup>

Attorney for  
SOUTHERN CALIFORNIA EDISON COMPANY

2244 Walnut Grove Avenue  
Post Office Box 800  
Rosemead, California 91770  
Telephone: (626) 302-6713  
Facsimile: (626) 302-6693  
E-mail: Andrea.Tozer@sce.com

DATE: January 4, 2016

---

<sup>28</sup> Pursuant to Rule 1.8(d), the Settling Parties, except CESA, have authorized SCE to sign these joint comments on their behalf.

**Appendix A**

**SCE's Recommended Revisions to the PD and APD**

**SETTLING PARTIES' PROPOSED MODIFICATIONS TO PROPOSED DECISION  
AND ALTERNATE PROPOSED DECISION MODIFYING AND ADOPTING JOINT  
SETTLEMENT AGREEMENT ON APPLICATION OF SOUTHERN CALIFORNIA  
EDISON COMPANY (U-338 E) FOR APPROVAL FOR APPROVAL OF ITS CHARGE  
READY AND MARKET EDUCATION PROGRAMS**

Proposed text deletions are in bold strikethrough (~~abcd~~)

Proposed text additions are bold underlined (abcd)

Reference	Proposed Modifications
<b>PD/APD Text</b>	
PD & APD p. 2	SCE is authorized to collect <u>revenue requirements associated with up to \$22 million (\$2014) of capital and O&amp;M expenditures</u> <del>in revenue requirement</del> to implement the Phase 1 pilot Charge Ready and complementary Market Education Programs.
PD & APD Section 3.3.2. p. 16	We agree with EDF and TURN that SCE should use Phase 1 to evaluate whether the rebate levels are appropriate <u>for Phase 2 implementation</u> .
PD Section 3.6 p. 21 / APD Section 3.6 p. 22	Finally, SCE will collaborate with the Advisory Board, which shall include Energy Division, <del>who</del> , <u>Energy Division</u> will maintain final authorization of the content of the pilot report and criteria for pilot evaluation.
PD Section 3.6 p. 23 / APD Section 3.6 p. 24	In addition, we will require that quarterly reports provide information on the use of the Submetering Protocol to measure energy use associated with non-networked EVSE, how vendors are qualified to participate in the programs, which vendors have been qualified and which have not, and any ongoing information on base costs for charging equipment, <u>unless such information is confidential or proprietary</u> .
PD Section 3.6 p. 24 / APD Section 3.6 pp. 24-25	Finally, SCE will collaborate with the Advisory Board, which shall include Energy Division, <del>who</del> , <u>Energy Division</u> will maintain final authorization of the content of the pilot report and criteria for pilot evaluation.

Reference	Proposed Modifications
PD Section 3.6 p. 25 / APD Section 3.6 p. 26	In addition, we will require that quarterly reports provide information on the use of the Submetering Protocol to measure energy use associated with non-networked EVSE, how vendors are qualified to participate in the programs, which vendors have been qualified and which have not, and any ongoing information on base costs for charging equipment, <b><u>unless such information is confidential or proprietary.</u></b>
PD & APD Section 3.7 p. 29	SCE is authorized to establish the CRPBA, using the standard commercial paper interest rate, for purposes of recording and recovering <b><u>no more than revenue requirements associated with up to \$22 million (\$2014) of capital and O&amp;M expenditures.</u></b>
PD & APD Section 3.9 pp. 39-40	<p>Furthermore, we direct SCE to work with the Advisory Board to determine metrics needed to evaluate the effectiveness of the Load Management strategies in achieving the Guiding Principles of the Settlement.<sup>88</sup> <del>EDF suggests metrics that serve as a starting point for measuring the effect of managing the EVs' charging load.<sup>89</sup> We restate and refine EDF's performance metrics here that shall serve as the minimum set of considerations in reviewing and evaluating SCE's Load Management strategy:</del></p> <ol style="list-style-type: none"> <li><del>1) Improved capacity factors for renewable generators,</del></li> <li><del>2) Enablement of customers' use of Preferred Resources,</del></li> <li><del>3) Improved customer load factor,</del></li> <li><del>4) Reduction in curtailment of renewable energy,</del></li> <li><del>5) Utilization of EVSE,</del></li> <li><del>6) Strategic placement of EVs, and as applicable the associated Distributed Energy Resources, consistent with the system locational benefit considerations of AB 327 and R.14-08-013, and</del></li> <li><del>7) Improvement of participation in and effectiveness of complementary Low-Income Programs for eligible Multi-Family Residential (or Multi-Unit Dwelling) customers.</del></li> </ol> <p>-----</p> <p><sup>88</sup> Guiding Principles 6, 7, and 1c relate to Load Management in that a site host's strategy should averse grid impacts, realize cost savings, and integrate renewable energy or complement other clean energy programs.</p> <p><del><sup>89</sup> EDF-02 at 31.</del></p>
PD & APD Section 3.9 pp. 39-40 – Alternate Proposal	<p>Furthermore, we direct SCE to work with the Advisory Board to determine metrics needed to evaluate the effectiveness of the Load Management strategies in achieving the Guiding Principles of the Settlement.<sup>88</sup> EDF suggests metrics that serve as a starting point for measuring the effect of managing the EVs' charging load.<sup>89</sup> We restate and refine EDF's performance metrics here that shall serve as the minimum set of considerations in reviewing and evaluating SCE's Load Management strategy:</p> <ol style="list-style-type: none"> <li>1) <b>Improved e</b>Capacity factors for renewable generators,</li> <li>2) <b>Enablement Coincidence</b> of customers' use of Preferred Resources,</li> <li>3) <b>Improved e</b>Customer load factor,</li> <li>4) <b>Reduction in e</b>Curtailment of renewable energy,</li> <li>5) Utilization of EVSE,</li> <li>6) Strategic placement of EVs, and as applicable the associated Distributed Energy Resources, consistent with the system locational benefit considerations of AB 327 and</li> </ol>

Reference	Proposed Modifications
	<p>R.14-08-013, <u>for the purpose of evaluating the effectiveness of load management if sufficient information is available</u>, and</p> <p>7) <del>Improvement of p</del>Participation in <del>and effectiveness of</del> complementary Low-Income Programs for eligible Multi-Family Residential (or Multi-Unit Dwelling) customers.</p> <p>-----</p> <p><sup>88</sup> Guiding Principles 6, 7, and 1c relate to Load Management in that a site host’s strategy should averse grid impacts, realize cost savings, and integrate renewable energy or complement other clean energy programs.</p> <p><sup>89</sup> EDF-02 at 31.</p>
<p>PD &amp; APD Section 3.10 pp. 41-42</p>	<p>The CalEPA and Senate Bill (SB) 535 identify Disadvantaged Communities as those identified by the CalEnviroScreen tool.<sup>92</sup> <del>The use of a State-wide scope for determining which disadvantaged communities would be eligible for installations poses a challenge to the extent that certain utility territories—as a result of their relative geographic size, local industrial composition, and residents—have a disproportionate number of census tracts that are scored within the top quartile by the CalEnviroScreen tool. The inclusion of census tracts located within other utility service territories in the definition of Disadvantaged Communities would have the unintended consequence of excluding from eligibility the SCE-area census tracts that are relatively less disadvantaged than those elsewhere in the State. For these reasons, the Settlement is modified to define the eligible disadvantaged communities as the top quartile of census tracts within SCE’s Service Territory per the CalEnviroScreen scores. In addition, this designation permits a greater geographic dispersion of Destination Center installations that can improve the public’s access to a more expansive network of charging infrastructure, with commensurate potential benefits for EV adoption.</del></p>
<p>PD &amp; APD Section 3.14 p. 47</p>	<p>To ensure that the <del>SCE and IBEW licensed</del> contractors install electric vehicle infrastructure safely, <del>they</del> <u>the electricians</u> must receive certification from the Electric Vehicle Infrastructure Training Program (EVITP). The EVITP, which is supported by the U.S. Department of Energy, <del>identifies</del> <u>certifies</u> electricians that have been safely trained to perform EV infrastructure work.</p>
<p><b>PD/APD Findings of Fact</b></p>	
<p>24 (PD &amp; APD)</p>	<p><del>A service territory-based definition of disadvantaged communities, as opposed to a statewide definition, will allow for the most equitable access to incentives.</del> [DELETE IN ITS ENTIRETY]</p>
<p><b>PD/APD Conclusions of Law</b></p>	
<p>6 (PD &amp; APD)</p>	<p>SCE should use Phase 1 to evaluate whether the adopted rebate levels are appropriate <u>for Phase 2 implementation</u>.</p>
<p>21 PD &amp; 22 APD</p>	<p>It is reasonable to require at least 10% of charging stations be deployed in disadvantaged communities, <del>using a service territory-based definition of the term</del>.</p>

Reference	Proposed Modifications
28 PD & 29 APD	It is reasonable for SCE to implement safety protocols and ensure that the <del>SCE employees and IBEW licensed</del> contractors installing electric vehicle infrastructure receive certification from the Electric Vehicle Infrastructure Training Program (EVITP).
<b>PD/APD Ordering Paragraphs</b>	
1 (PD & APD)	The Southern California Edison Company is authorized to recover <u>the revenue requirements associated with</u> up to \$22 million <b>(\$2014) of capital and O&amp;M expenditures</b> for implementation of Phase 1 of its Charge Ready and Market Education Programs.
4 (PD & APD)	The terms in the Settlement filed July 9, 2015, are modified such that <del>disadvantaged communities are defined on a service territory basis and not on a statewide basis, and such that</del> the Southern California Edison Company shall coordinate its market education and outreach to Multi-Unit Dwellings in this market segment with its existing single point of contact outreach to the segment.
6 (PD & APD)	The terms in the Settlement filed July 9, 2015, are modified such that the Southern California Edison Company (SCE) shall file and serve a pilot report to provide Phase 1 data, and recommend any necessary changes to Phase 2, after at least 12 months of program implementation and at least 1,000 charging station installations, but in any event, within 24 months of program implementation. The terms in the Settlement filed July 9, 2015, regarding cost management and program suspension are modified such that SCE is authorized to establish a Charge Ready Balancing Account, using the standard commercial paper <u>interest</u> rate, to record the authorized <u>revenue requirements associated with costs</u> , up to \$22 million <b>(\$2014) of capital and O&amp;M expenditures</b> , of its Charge Ready and Market Education Programs. Costs shall be reviewed in SCE’s annual Energy Resource Recovery Account application.
12 (PD & APD)	The Southern California Edison Company shall work with the Advisory Board to determine metrics needed to evaluate the effectiveness of the Load Management strategies in achieving the Guiding Principles of the Settlement filed July 9, 2015. <del>These metrics shall include:</del> <b>a) Improved capacity factors for renewable generators,</b> <b>b) Enablement of customers’ use of Preferred Resources,</b> <b>c) Improved customer load factor,</b> <b>d) Reduction in curtailment of renewable energy,</b> <b>e) Utilization of EVSE,</b> <b>f) Strategic placement of EVs, and as applicable the associated Distributed Energy Resources, consistent with the system locational benefit considerations of AB 327 and R.14-08-013, and</b> <b>g) Improvement of participation in and effectiveness of complementary Low-Income Programs for eligible Multi-Family Residential (or Multi-Unit Dwelling) customers.</b>
12 (PD & APD) – Alternate Proposal	The Southern California Edison Company shall work with the Advisory Board to determine metrics needed to evaluate the effectiveness of the Load Management strategies in achieving the Guiding Principles of the Settlement filed July 9, 2015. These metrics shall include: a) <del>Improved e</del> Capacity factors for renewable generators,



Reference	Proposed Modifications
	b) <del>Enablement</del> <b>Coincidence</b> of customers' use of Preferred Resources, c) <del>Improved</del> <b>e</b> Customer load factor, d) <del>Reduction in</del> <b>e</b> Curtailment of renewable energy, e) Utilization of EVSE, f) Strategic placement of EVs, and as applicable the associated Distributed Energy Resources, consistent with the system locational benefit considerations of AB 327 and R.14-08-013, <b><u>for the purpose of evaluating the effectiveness of load management if sufficient information is available</u></b> , and g) <del>Improvement of</del> <b>p</b> Participation in <del>and effectiveness of</del> complementary Low-Income Programs for eligible Multi-Family Residential (or Multi-Unit Dwelling) customers.
13 (PD & APD)	The Southern California Edison Company (SCE) shall ensure that <del>SCE employees and International Brotherhood of Electrical Workers (IBEW)</del> <b>licensed the</b> contractors installing electric vehicle infrastructure receive certification from the Electric Vehicle Infrastructure Training Program.

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

Application of Southern California Edison  
Company (U338E) for Approval of Its Charge  
Ready and Market Education Programs

Application 14-10-014  
(Filed October 30, 2014)

**CERTIFICATE OF SERVICE**

I hereby certify that, pursuant to the Commission's Rules of Practice and Procedure, I have this day served a true copy of **SETTLING PARTIES' JOINT COMMENTS ON PROPOSED DECISION AND ALTERNATE PROPOSED DECISION MODIFYING AND ADOPTING JOINT SETTLEMENT AGREEMENT ON APPLICATION OF SOUTHERN CALIFORNIA EDISON COMPANY (U 338-E) FOR APPROVAL OF ITS CHARGE READY AND MARKET EDUCATION PROGR TAMS** on all parties identified on the attached service list(s) **A.14-10-014**. Service was effected by one or more means indicated below:

- Transmitting the copies via e-mail to all parties who have provided an e-mail address.
- Placing the copies in sealed envelopes and causing such envelopes to be delivered by hand or by overnight courier to the offices of the Assigned ALJ(s) or other addressee(s).

**ALJ Karin M. Hieta**  
CPUC  
505 Van Ness Ave.  
San Francisco, CA 94102

**ALJ Darwin Farrar**  
CPUC  
505 Van Ness Ave.  
San Francisco, CA 94102

Executed **January 4, 2016**, at Rosemead, California.

/s/ Gina Leisure

**Gina Leisure**  
**Executive Assistant**  
SOUTHERN CALIFORNIA EDISON COMPANY  
2244 Walnut Grove Avenue  
Post Office Box 800  
Rosemead, California 91770



California  
Public Utilities  
Commission



[CPUC Home](#)

## CALIFORNIA PUBLIC UTILITIES COMMISSION

### Service Lists

**PROCEEDING: A1410014 - EDISON - FOR APPROVA**  
**FILER: SOUTHERN CALIFORNIA EDISON COMPANY**  
**LIST NAME: LIST**  
**LAST CHANGED: DECEMBER 30, 2015**

[Download the Comma-delimited File](#)  
[About Comma-delimited Files](#)

[Back to Service Lists Index](#)

### Parties

CC SONG  
 REGULATORY ANALYST  
 MARIN CLEAN ENERGY  
 EMAIL ONLY  
 EMAIL ONLY, CA 00000  
 FOR: MARIN CLEAN ENERGY  
 JOHN BOESEL  
 CALSTART  
 EMAIL ONLY  
 EMAIL ONLY, CA 00000  
 FOR: CALSTART

FORREST NORTH  
 CHIEF OPERATING OFFICER  
 RECARGO, INC.  
 1015 ABBOT KINNEY BLVD.  
 VENICE, CA 90291  
 FOR: RECARGO, INC.  
 ALEXANDER KEROS  
 ADVANCED VEHICLE & INFRASTRUCTURE POLICY  
 GENERAL MOTORS, LLC  
 3050 LOMITA BLVD.  
 TORRANCE, CA 90505  
 FOR: GENERAL MOTORS LLC

ANDREA L. TOZER  
 ATTORNEY

CHRISTOPHER WARNER  
 PACIFIC GAS AND ELECTRIC COMPANY  
 EMAIL ONLY  
 EMAIL ONLY, CA 00000  
 FOR: PACIFIC GAS AND ELECTRIC COMPANY

KEVIN LEE  
 ATTORNEY  
 NRG ENERGY, INC.  
 11390 W. OLYMPIC BLVD., STE. 250  
 LOS ANGELES, CA 90064  
 FOR: NRG ENERGY, INC.  
 JESSALYN ISHIGO  
 ENVIRONMENTAL BUSINESS DEVELOPMENT OFF.  
 AMERICAN HONDA MOTOR CO., INC.  
 1919 TORRANCE BLVD.  
 TORRANCE, CA 90501  
 FOR: AMERICAN HONDA MOTOR CO., INC.  
 MAX BAUMHEFNER  
 LEGAL FELLOW  
 NATURAL RESOURCES DEFENSE COUNCIL  
 111 SUTTER ST., 20TH FLOOR  
 SAN FRANCISCO, CA 91404  
 FOR: THE CHARGE AHEAD CALIFORNIA  
 CAMPAIGN (MEMBERS: NRDC, COMMUNITIES  
 FOR A BETTER ENVIRONMENT , ENVIRONMENT  
 CALIFORNIA RESEARCH & POLICY CENTER,  
 COALITION FO CLEAN AIR, AND THE  
 GREENLINING INSTITUTE)  
 JOHN W. LESLIE, ESQ  
 ATTORNEY

SOUTHERN CALIFORNIA EDISON COMPANY  
2244 WALNUT GROVE AVE. / PO BOX 800  
ROSEMEAD, CA 91770  
FOR: SOUTHERN CALIFORNIA EDISON COMPANY

DONALD C. LIDDELL  
ATTORNEY  
DOUGLAS & LIDDELL  
2928 2ND AVE.  
SAN DIEGO, CA 92103  
FOR: CALIFORNIA ENERGY STORAGE ALLIANCE  
(CESA)

SACHU CONSTANTINE  
DIR. OF POLICY  
CENTER FOR SUSTAINABLE ENERGY  
9325 SKY PARK COURT, SUITE 100  
SAN DIEGO, CA 92123  
FOR: CENTER FOR SUSTAINABLE ENERGY  
JAMIE MAULDIN  
ADAMS BROADWELL JOSEPH & CARDOZO, PC  
601 GATEWAY BLVD., STE. 1000  
SOUTH SAN FRANCISCO, CA 94080  
FOR: COALITION OF CALIFORNIA UTILITY  
EMPLOYEES (CCUE)

ELISE TORRES  
STAFF ATTORNEY  
THE UTILITY REFORM NETWORK  
785 MARKET STREET, SUITE 1400  
SAN FRANCISCO, CA 94103  
FOR: THE UTILITY REFORM NETWORK (TURN)  
JAY FRIEDLAND  
SR. POLICY ADVISOR  
PLUG IN AMERICA  
2370 MARKET ST., NO. 419  
SAN FRANCISCO, CA 94114  
FOR: PLUG IN AMERICA  
GREGORY MORRIS  
DIRECTOR  
GREEN POWER INSTITUTE  
2039 SHATTUCK AVE., SUITE 402  
BERKELEY, CA 94704  
FOR: GREEN POWER INSTITUTE

DENTONS US LLP  
600 WEST BROADWAY, STE. 2600  
SAN DIEGO, CA 92101  
FOR: SHELL ENERGY NORTH AMERICA (US),  
L.P.  
E. GREGORY BARNES  
SAN DIEGO GAS & ELECTRIC COMPANY  
8330 CENTURY PARK COURT, BLDG 3  
SAN DIEGO, CA 92123  
FOR: SAN DIEGO GAS & ELECTRIC COMPANY

MICHAEL CHIACOS  
ENERGY AND TRANSPORTATION MANAGER  
COMMUNITY ENVIRONMENTAL COUNCIL  
26 W. ANAPAMU ST., 2ND FLR.  
SANTA BARBARA, CA 93101  
FOR: COMMUNITY ENVIRONMENTAL COUNCIL  
IRYNA KWASNY  
CALIF PUBLIC UTILITIES COMMISSION  
LEGAL DIVISION  
ROOM 4107  
505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3214

FOR: ORA  
LARISSA KOEHLER  
ATTORNEY  
ENVIRONMENTAL DEFENSE FUND  
123 MISSION STREET, 28TH FLOOR  
SAN FRANCISCO, CA 94105  
FOR: ENVIRONMENTAL DEFENSE FUND  
JIM BAAK  
PROGRAM DIR - GRID INTEGRATION  
VOTE SOLAR  
360 22ND FLOOR, SUITE 730  
OAKLAND, CA 94612  
FOR: VOTE SOLAR  
COLLEEN C. QUINN  
VP - GOV'T. RELATIONS AND PUBLIC POLICY  
CHARGEPOINT, INC.  
254 EAST HACIENDA AVENUE  
CAMPBELL, CA 95008  
FOR: CHARGEPOINT

## Information Only

ABEGAIL TINKER  
PACIFIC GAS AND ELECTRIC COMPANY  
EMAIL ONLY  
EMAIL ONLY, CA 00000  
CASE COORDINATION  
PACIFIC GAS AND ELECTRIC COMPANY  
EMAIL ONLY  
EMAIL ONLY, CA 00000  
DAVE PACKARD  
CHARGEPOINT, INC.  
EMAIL ONLY  
EMAIL ONLY, CA 00000

JAMES HALL  
MGR.- ADVANCED VEHICLE AND INFRA. POLICY  
GENERAL MOTORS LLC

ANNE SMART  
CHARGEPOINT, INC.  
EMAIL ONLY  
EMAIL ONLY, CA 00000  
CATHERINE BUCKLEY  
PACIFIC GAS AND ELECTRIC COMPANY  
EMAIL ONLY  
EMAIL ONLY, CA 00000  
JAMES ELLIS  
DIR. - ELECTRIFICATION & EVS  
PACIFIC GAS AND ELECTRIC COMPANY  
EMAIL ONLY  
EMAIL ONLY, CA 00000  
JORDAN RAMER  
EV CONNECT, INC.  
EMAIL ONLY

EMAIL ONLY  
 EMAIL ONLY, CA 00000  
 LAUREN DUKE  
 DEUTSCHE BANK SECURITIES INC.  
 EMAIL ONLY  
 EMAIL ONLY, NY 00000

SARAH VAN CLEVE  
 SOUTHERN CALIFORNIA EDISON COMPANY  
 EMAIL ONLY  
 EMAIL ONLY, CA 00000

SUBID WAGLEY  
 PACIFIC GAS AND ELECTRIC COMPANY  
 EMAIL ONLY  
 EMAIL ONLY, CA 00000

MRW & ASSOCIATES, LLC  
 EMAIL ONLY  
 EMAIL ONLY, CA 00000

JIM KOBUS  
 RESEARCH  
 MORGAN STANLEY  
 1585 BROADWAY, 38TH FLOOR  
 NEW YORK, NY 10036  
 ALEC BROOKS  
 AEROVIRONMENT, INC.  
 181 W. HUNTINGTON DRIVE, SUITE 202  
 MONROVIA, CA 91016  
 FOR: AEROVIRONMENT, INC.  
 HANNON RASOOL  
 ADMIN. - CALIF. REGULATORY AFFAIRS  
 SAN DIEGO GAS & ELECTRIC COMPANY  
 8330 CENTURY PARK CT. CP32D  
 SAN DIEGO, CA 92123  
 CENTRAL FILES  
 SAN DIEGO GAS & ELECTRIC COMPANY  
 8330 CENTURY PARK CT, CP31-E  
 SAN DIEGO, CA 92123-1530

MARC D. JOSEPH  
 ATTORNEY AT LAW  
 ADAMS BROADWELL JOSEPH & CARDOZO  
 601 GATEWAY BLVD. STE 1000  
 SOUTH SAN FRANCISCO, CA 94080  
 MARCEL HAWIGER  
 STAFF ATTORNEY  
 THE UTILITY REFORM NETWORK  
 785 MARKET ST., STE. 1400  
 SAN FRANCISCO, CA 94103  
 NICOLE JOHNSON  
 REGULATORY ATTORNEY  
 CONSUMER FEDERATION OF CALIFORNIA  
 150 POST ST., STE. 442  
 SAN FRANCISCO, CA 94108  
 CALIFORNIA ENERGY MARKETS  
 425 DIVISADERO ST. STE 303  
 SAN FRANCISCO, CA 94117-2242

EMAIL ONLY, CA 00000  
 FOR: EV CONNECT, INC.  
 PAUL D. HERNANDEZ  
 ENERGY & TRANSPORTATION POLICY MANAGER  
 CENTER FOR SUSTAINABLE ENERGY  
 EMAIL ONLY  
 EMAIL ONLY, CA 00000  
 SEPHRA A. NINOW, J.D.  
 REGULATORY AFFAIRS MGR.  
 CENTER FOR SUSTAINABLE ENERGY  
 EMAIL ONLY  
 EMAIL ONLY, CA 00000  
 THOMAS ASHLEY  
 DIRECTOR OF GOVERNMENT AFFAIRS  
 GREENLOTS  
 EMAIL ONLY  
 EMAIL ONLY, CA 00000  
 TAM HUNT  
 COMMUNITY RENEWABLES SOLUTIONS, LLC  
 EMAIL ONLY  
 EMAIL ONLY, CA 00000-0000  
 JOSEPH HALSO  
 LEGAL FELOOW  
 SIERRA CLUB  
 50 F STREET, NW, 8TH FLR.  
 WASHINGTON, DC 20001  
 CASE ADMINISTRATION  
 SOUTHERN CALIFORNIA EDISON COMPANY  
 2244 WALNUT GROVE AVENUE, ROOM 370  
 ROSEMEAD, CA 91770

PARINA P. PARIKH  
 REGULATORY CASE MGR.  
 SAN DIEGO GAS & ELECTRIC COMPANY  
 8330 CENTURY PARK COURT, CP 32D  
 SAN DIEGO, CA 92123  
 BRIAN KORPICS  
 POLICY MANAGER  
 THE CLEAN COALITION  
 16 PALM ST.  
 MENLO PARK, CA 94025  
 FOR: THE CLEAN COALITION  
 ERIC BORDEN  
 ENERGY POLICY ANALYST  
 THE UTILITY REFORM NETWORK  
 785 MARKET STREET, STE. 1400  
 SAN FRANCISCO, CA 94103  
 SHIRLEY WOO  
 PACIFIC GAS & ELECTRIC COMPANY  
 77 BEALE STREET, B30A  
 SAN FRANCISCO, CA 94105

DIANE FELLMAN  
 VP - REGULATORY & GOVERNMENT AFFAIRS  
 NRG WEST REGION  
 100 CALIFORNIA ST., STE. 650  
 SAN FRANCISCO, CA 94111-4505  
 RYAN SCHUCHARD  
 POLICY DIR.  
 CALSTART  
 501 CANAL BLVD., NO. G  
 RICHMOND, CA 94804

MCE REGULATORY  
MARIN CLEAN ENERGY  
1125 TAMALPAIS AVENUE  
SAN RAFAEL, CA 94901

PHILLIP MULLER  
PRESIDENT  
SCD ENERGY SOLUTIONS  
436 NOVA ALBION WAY  
SAN RAFAEL, CA 94903

JIM HAWLEY  
ELECTRIC VEHICLE CHARGING ASSN.  
455 CAPITOL MALL, STE. 600  
SACRAMENTO, CA 95814

FOR: ELECTRIC VEHICLE CHARGING  
ASSOCIATION

JOHN SHEARS  
CEERT  
1100 11TH STREET, SUITE 311  
SACRAMENTO, CA 95814

LYNN HAUG  
ELLISON, SCHNEIDER & HARRIS L.L.P.  
2600 CAPITOL AVENUE, SUITE 400  
SACRAMENTO, CA 95816-5931

SHALINI SWAROOP  
REGULATORY & LEGISLATIVE COUNSEL  
MARIN CLEAN ENERGY  
1125 TAMALPAIS AVENUE  
SAN RAFAEL, CA 94901

DAVID PETERSON  
CHARGEPOINT, INC.  
254 EAST HACIENDA AVENUE  
CAMPBELL, CA 95008

JIM HAWLEY  
DEWEY SQUARE GROUP, LLC  
1020 16TH STREET, SUITE 20  
SACRAMENTO, CA 95814

SCOTT BLAISING  
COUNSEL  
BRAUN BLAISING MCLAUGHLIN & SMITH, P.C.  
915 L STREET, SUITE 1270  
SACRAMENTO, CA 95814

## State Service

CHLOE LUKINS  
ORA DIV.  
CALIFORNIA PUBLIC UTILITIES COMMISSION  
EMAIL ONLY  
EMAIL ONLY, CA 00000

JOSE ALIAGA-CARO  
UTILITIES ENGINEER  
CALIFORNIA PUBLIC UTILITIES COMMISSION  
EMAIL ONLY  
EMAIL ONLY, CA 00000

NOEL CRISOSTOMO  
PUBLIC UTILITIES REGULATORY ANALYST  
CPUC - ENERGY DIV.  
EMAIL ONLY  
EMAIL ONLY, CA 00000

ANA M. GONZALEZ  
CALIF PUBLIC UTILITIES COMMISSION  
DIVISION OF ADMINISTRATIVE LAW JUDGES  
ROOM 2106

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3214

DARWIN FARRAR  
CALIF PUBLIC UTILITIES COMMISSION  
DIVISION OF ADMINISTRATIVE LAW JUDGES  
ROOM 5041

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3214

JOANNA GUBMAN  
CALIF PUBLIC UTILITIES COMMISSION  
EXECUTIVE DIVISION  
AREA 4-A

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3214

SARAH R. THOMAS

JASON HOUCK  
CPUC - ENERGY  
EMAIL ONLY  
EMAIL ONLY, CA 00000

KARIN HIETA  
A.L.J. PRO TEM  
CALIFORNIA PUBLIC UTILITIES COMMISSION  
EMAIL ONLY  
EMAIL ONLY, CA 00000

SANDY GOLDBERG  
SR. COUNSEL  
GOVERNOR'S OFF. OF PLANING & RESEARCH  
EMAIL ONLY  
EMAIL ONLY, CA 00000

ANAND DURVASULA  
CALIF PUBLIC UTILITIES COMMISSION  
ENERGY SAFETY & INFRASTRUCTURE BRANCH  
AREA

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3214

JENNIFER KALAFUT  
CALIF PUBLIC UTILITIES COMMISSION  
EXECUTIVE DIVISION  
ROOM 5303

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3214

MELICIA CHARLES  
CALIF PUBLIC UTILITIES COMMISSION  
PROCUREMENT STRATEGY AND OVERSIGHT BRANC  
AREA

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3214

CALIF PUBLIC UTILITIES COMMISSION  
LEGAL DIVISION  
ROOM 5033  
505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3214

[TOP OF PAGE](#)  
[BACK TO INDEX OF SERVICE LISTS](#)