**FIRST SET OF DATA REQUESTS BY UTILITY CONSUMERS’ ACTION NETWORK**

**UCAN Data Requests to SDG&E in A.17-01-020**

Date: May 25, 2017

Responses

Due: June 9, 2017

To: SDG&E

From: UCAN

Don Kelly, Executive Director

Jane Krikorian, J.D.

3405 Kenyon Street, Suite 401

San Diego, CA 92110

(619) 610-9001

Data Request No: 1

(Please see instructions below)

**INSTRUCTIONS:**

Pursuant to rule 10.1 of the California Public Utilities Commission’s Rules of Practice and Procedure UCAN hereby submits this data request for information from SDG&E. If you will be unable to meet the above deadline, or need to discuss the content of this request, please call UCAN counsel at the number(s) shown above before the due date.

If you are unable to provide the information by the due date, have an objection to any request, or plan to assert a privilege to any request, please provide a written explanation to UCAN’s counsel seven calendar days before the due date as to why the response date cannot be met and your best estimate of when the information can be provided.

If you are asserting an objection or privilege please provide the specific nature of that objection or privilege claimed and the facts upon which such claim is based. If any document is redacted, please clearly identify and describe any information that is redacted from the document and provide an explanation for the redaction. Please identify the person who provides the response and his (her) phone number. Provide electronic responses if possible.

If a document is available in Word or Excel format, do not send it as a PDF file. All data responses need to have each page numbered, referenced, and indexed so worksheets can be followed. If any number is calculated, include a copy of all electronic files so the formula and their sources can be reviewed.

These data requests shall be deemed continuing in nature so that you shall produce any additional or more current information that come to your attention after your initial responses have been sent up to the time of hearing or settlement.

**UCAN TRANSPORTATION ELECTRIFICATION DATA REQUEST #1**

**A.17.01.020**

On September 14, 2016 Commissioner Carla Peterman issued an Assigned Commissioners’ Ruling (ACR) in rulemaking R.13-11-007 directing Investor Owned Utilities to present applications for projects to address transportation electrification (TE) pursuant to Senate Bill 350. The ACR, citing to Pub. Util. Code §740.12(b), noted that:

*“The commission, in consultation with the [CARB] and the [CEC], shall direct electrical corporations to file applications for programs and investments to accelerate widespread transportation electrification to reduce dependence on petroleum, meet air quality standards, achieve the goals set forth in the Charge Ahead California Initiative …, and reduce emissions of greenhouse gases to 40 percent below 1990 levels by 2030 and to 80 percent ... below 1990 levels by 2050.* ***Programs proposed by electrical corporations shall seek to minimize overall costs and maximize overall benefits.”[[1]](#footnote-1) (Emphasis added)***

Pursuant to this statutory directive the ACR required investor owned electric utilities to produce applications by January 20, 2017 that proposed both non-controversial programs of short duration that would receive priority review from the Commission with a budget cap of no more than $4 million per program and a total cap of $20 million. In addition, the ACR called for the IOUs to propose programs of longer duration that would require a budget greater than $4 million. Specifically, the ACR holds:

*“TE Applications should designate for each proposed program the mechanism for the*

*Commission’s review, given the characteristics of the program:*

*1. Priority Review – Non-controversial, short term (e.g. 1 year) investments*

*Budget is limited to no more than $4 million in costs per project, with a total funding limit of $20 million for each utility.*

*2. Standard Review – Programs that do not meet the above criteria (e.g. 2-5 years or greater budget)”[[2]](#footnote-2)*

On January 20, 2017 SDG&E along with PG&E and SCE filed their TE applications. After reviewing SDG&E’s application UCAN has concerns about both the proposed costs of SDG&E’s priority review projects which exceeds the ACR’s cost caps, as well as their standard review project for home charging. While UCAN supports the state’s goal of widespread transportation electrification, UCAN also has concerns regarding ratepayer funding and utility ownership of the projects described in the current SDG&E application. The following questions, therefore, relate to the costs of the projects, utility ownership of the projects, and whether any alternatives to ratepayer funding have been pursued by SDG&E.

1. **Costs**

In the Assigned Commissioner’s Ruling (ACR) on p. 31, Commissioner Peterman directed the utilities to propose “priority review projects [that] should be non-controversial in nature and limited to no more than $4 million in costs per project, with a total funding limit of $20 million for each utility.”

1. **Question:** In SDG&E’s proposals they put forward project that do not include escalation and overhead loader costs which when added to the costs of SDG&E’s priority review projects increases the cost to over $26 million dollars. Has SDG&E determined how it would reduce the costs for their priority projects if the Commission determines that the overall total costs of the priority review projects will be no more than $4 million per project, no more than $20 million in overall funding?

* If so, please explain.

1. **Question:** In your application, you have proposed six priority projects that after adjustments total $26,428 million, all ratepayer funded. Please explain if SDG&E has identified any source of grants or industry funding to offset some of the costs to the ratepayers for the six priority projects?

* If so, please describe what funding sources SDG&E has identified. If not, please describe the efforts SDG&E has made to identify any additional funding sources that can be leveraged to reduce ratepayer costs.

1. **Modifications**

In the Assigned Commissioner’s Ruling (ACR) on p.9, fn.1, Commissioner Peterman notes that “the Legislature has not authorized the Commission to use a separately authorized source of monies to fund the TE projects and investments contemplated in Pub. Util. Code §740.12. Instead, the monies to fund these TE projects and investments are to come from the ratepayers of the electrical corporations, *or from other funding sources that may exist*.” (Emphasis added.)

**Question:** For each of the six priority review projects please answer the following questions:

**Project 1:** **SDG&E’s Airport Ground Support Equipment Project**

Objective – Addition of 45 new charging ports at airport and retrofit 15 existing chargers.

1. If the objective were changed to provide the necessary infrastructure up to “the stub” only (make ready work) how much would it reduce the installation costs to ratepayers for this project from what is proposed?
2. Has SDG&E considered or had talks with the users of the airport chargers, or third party market participants of EV charging infrastructure, of them providing any funding for the installation of this infrastructure?

* If so, please explain, if not, why not?

1. If the project were changed to provide make ready work only, how much funding would the airport users of this infrastructure have to pay to make the charging ports operational?
2. In terms of Operation and Maintenance (O&M) costs going forward, if a third party owned the EV equipment called for in this project, how much per year would SDG&E save from avoided O&M costs?

* How many years does SDG&E anticipate the infrastructure in this proposal will be operational?

1. Project Partners – has SDG&E contacted any project partner (San Diego International Airport; Delta Airlines, American Airlines, et al; IBEW) about providing additional funding for the 45 charging ports and retrofit of 15 existing ports?
2. Leveraged Funding – has SDG&E approached any person, agency, airport tenant and/or airport personnel to see if there is any additional funding they would provide for the funding of the proposed charging ports?
3. Disadvantaged Communities – please describe how, if at all, the addition of 45 new charging ports at airport and retrofit 15 existing chargers at the San Diego International Airport targets Disadvantaged Communities.

**Project 2:** **Electrify Local Highways Project**

Objective –Install Level 2 (L2) and DC fast chargers (DCFC’s) at four Caltrans owned Park and Ride locations

1. If the objective were changed to provide the necessary infrastructure up to “the stub” only (make ready work) how much would it reduce the installation costs to ratepayers for this project from what is proposed?
2. Has SDG&E considered or had talks with any third party providers of electric vehicle charging infrastructure to see if partnering with these third party providers would yield a project that costs less than presently proposed?

* If so, please explain, if not, why not?

1. If the project were changed to provide make ready work only, how much funding would third party providers, for example ChargePoint, have to pay to make the proposed charging infrastructure operational?
2. In terms of Operation and Maintenance (O&M) costs going forward, if a third party owned the EV equipment called for in this project, how much per year would SDG&E save from avoided O&M costs?

* How many years does SDG&E anticipate the infrastructure in this proposal will be operational?

1. Project Partners – have any project partners (SANDAG; IBEW contractors; Electric Vehicle Service Providers (EVSP)) been asked to provide funding for the Level 2 (“L2”) and DC fast chargers (“DCFC’s”) at the four Caltrans-owned Park-and-Ride locations that would reduce the costs to the ratepayers?

* If so, please explain, if not, why not?

1. Leveraged Funding – Has SDG&E explored if Caltrans or any other agency can provide any additional funding for the charging stations that would reduce ratepayer costs?
2. Disadvantaged Communities – please describe the locations of the Park-and-Rides and how, if at all, placing L2 and DCFC’s at these Park-and-Rides targets Disadvantaged Communities.

**Project 3:** **Medium Duty/Heavy Duty and Forklift Port Electrification Project**

Objective – install, operate, maintain and own 30-40 installations to include EV supply equipment, an electric circuit, a load research meter and a data logger.

1. If the objective were changed to provide the necessary infrastructure up to “the stub” only (make ready work) how much would it reduce the installation costs to ratepayers for this project from what is proposed?
2. Has SDG&E considered or had talks with any third party providers of electric vehicle charging infrastructure to see if partnering with these third party providers would yield a project that costs less than presently proposed, i.e., SDG&E would subsidize make ready work and the third party provider would pay for and operate the 30-40 installations of EV supply equipment?

* If so, please explain, if not, why not?

1. If the project were changed for SDG&E to provide make ready work only, how much funding would third party providers have to pay to make the proposed charging infrastructure operational?
2. In terms of Operation and Maintenance (O&M) costs going forward, if a third party owned the EV equipment called for in this project, how much per year would SDG&E save from avoided O&M costs?

* How many years does SDG&E anticipate the infrastructure in this proposal will be operational?

1. Project Partners – have any of the project partners (San Diego Unified Port District; San Diego Port Tenant’s Association; San Diego Air Pollution Control District; Terminalift LLC; CEMEC; and Dole Food Company been asked to provide any funding for the 30-40 installations which will include a combination of components including electric vehicle supply equipment, an electric circuit, a load research meter and a data logger?
2. Leveraged Funding – can the project partners listed above provide additional leveraged funding for charging facilities?
3. Disadvantaged Communities – Please describe how, if at all, installing, operating, and maintaining 30-40 installations with aforementioned partners targets Disadvantaged Communities.

**Project 4:** **Fleet Delivery Services Project**

Objective – Install charging infrastructure (Level 2 and DCFC) to serve approximately 90 new electric vehicle delivery vehicles

1. If the objective were changed to provide the necessary infrastructure up to “the stub” only (make ready work) how much would it reduce the installation costs to ratepayers for this project from what is proposed?
2. Has SDG&E considered or had talks with any third party providers of electric vehicle charging infrastructure to see if partnering with these third party providers would yield a project that costs less than presently proposed, i.e., SDG&E would subsidize make ready work and the third party provider would pay for and operate the level 2 and DC fast chargers?

* If so, please explain, if not, why not?

1. If the project were changed for SDG&E to provide make ready work only, how much funding would third party providers have to pay to make the proposed charging infrastructure operational?
2. In terms of Operation and Maintenance (O&M) costs going forward, if a third party owned the EV equipment called for in this project, how much per year would SDG&E save from avoided O&M costs?

* How many years does SDG&E anticipate the infrastructure in this proposal will be operational?

1. Project Partners – have any of the project partners (UPS; CALSTART; other third parties) been asked to provide funding for the Level 2 and DCFC’s to serve approximately 90 new electric delivery vehicles?
2. Leveraged Funding – can UPS, CALSTART and other third parties provide funding for charging facilities?
3. Disadvantaged Communities - please describe how, if at all, installing Level 2 and DCFC charging infrastructure for 90 new electric vehicle delivery vehicles targets Disadvantaged Communities.

**Project 5:** **Green Taxi/Shuttle/Rideshare Project**

Objective **-** Support up to 4 EV taxis, 4 electric shuttles and 50 TNC/Rideshare EV’s by deploying up to 5 grid integrated charging facilities and provide drivers with home L2 EVSE where feasible. Partner with up to 4 Taxi Companies with SDG&E providing $10,000 per electric vehicle for up to 4 EV’s (one per taxi company.)

1. For the 5 grid integrated charging facilities, as well as the L2 EVSE installed in the drivers’ homes, if the project objective were changed to provide the necessary infrastructure up to “the stub” only (make ready work) how much would it reduce the installation costs to ratepayers for this project from what is proposed?
2. Has SDG&E considered or had talks with any third party providers of electric vehicle charging infrastructure to see if partnering with these third party providers would yield a project that costs less than presently proposed, i.e., SDG&E would subsidize make ready work and the third party provider would pay for and operate the grid integrated charging facilities, and the drivers would install the home chargers?

* If so, please explain, if not, why not?

1. If the project were changed for SDG&E to provide make ready work only, how much funding would third party providers have to pay to make the proposed charging infrastructure operational?
2. In terms of Operation and Maintenance (O&M) costs going forward, if a third party owned the EV equipment (excluding the taxis) called for in this project, how much per year would SDG&E save from avoided O&M costs?

* How many years does SDG&E anticipate the infrastructure in this proposal will be operational?

1. In terms of the $10,000 subsidy to taxi companies to purchase new electric vehicles, what terms or contractual obligations has SDG&E considered to ensure that the taxi companies operate the EVs purchased for as long as their useful life and that they do not take them out of service or sell them once purchased?

1. Project Partners – has SDG&E considered if the project partners (Taxi Companies, Shuttle Companies, and Transportation Network Companies) would provide funding for grid integrated charging facilities that will include DCFC and L2 EV supply equipment?
2. What analysis has SDG&E done to determine if a subsidy of $10,000 is the appropriate amount to encourage taxi companies to purchase EVs?
3. Has SDG&E contacted any local taxi companies to ask how much of a subsidy they would require before they purchased an EV?
4. Has SDG&E conducted any research on if a smaller subsidy would encourage taxi companies to purchase EVs?
5. Leveraged Funding – have any Taxi Companies, Shuttle Companies, Transportation Network Companies been asked to provide any funding for charging facilities called for in this project?
6. Disadvantaged Communities - please describe how, if at all, the project objectives target Disadvantaged Communities.

**Project 6:** **Dealership Incentives Project –**

Objective – Provide EV training, sales tactics, and cash incentives to local car dealerships and their salespeople to increase EV adoption.

1. Project Partners – have any of the project partners (local car dealerships associated with the New Car Dealers Association of San Diego County or Auto Alliance) been asked to provide additional funding themselves for education and outreach should SDG&E provide incentives?

* If so, please explain, if not, why not?

1. Leveraged Funding – has SDG&E determined if local car dealerships associated with the New Car Dealers Association of San Diego County or Auto Alliance can provide additional funding for education and outreach should SDG&E provide incentives to dealerships?
2. Disadvantaged Communities - please describe how, if at all, the project objectives target Disadvantaged Communities.
3. **Additional Questions**
4. In your application, you have proposed six priority projects that after adjustments total $26,428 million. Have you considered modifying your project list should the Commission determine that all IOUs have a total funding limit of $20,000,000 that includes overhead loaders and escalation costs?

If so, how**?** If not, why not?

1. If the Commission agrees to fund only 1 year for the priority review projects how, if at all, would SDG&E modify its proposed programs?
2. PU Code 740.12 requires that programs proposed by electrical corporations shall seek to minimize overall costs and maximize overall benefits. Has SDG&E considered proposals similar to PG&E and SCE that provide subsidies for individuals to install infrastructure rather than SDG&E proposing to own the EV equipment in its proposals?
3. PU Code 740.12(a)(1) states that “widespread TE should stimulate innovation and competition, enable consumer options in charging equipment and services, attract private capital investments…” SDG&E’s proposals seek funding so they can own the infrastructure – has SDG&E explored providing opportunities for 3rd party market participants to compete and bid for the charging stations thus providing innovation, competition and consumer options?

1. Assigned Commissioner’s Ruling Regarding the Filing of the Transportation Electrification Applications Pursuant to Senate Bill 350 (ACR), September 14, 2016, p. 6 [↑](#footnote-ref-1)
2. ACR, Appendix A, p. 2 [↑](#footnote-ref-2)