

ORA DATA REQUEST
ORA-SDG&E-DR-08
SDG&E VEHICLE GRID INTEGRATION PROJECT
A.14-04-014
SDG&E RESPONSE
DATE RECEIVED: JUNE 10, 2015
DATE RESPONDED: JUNE 24, 2015

1. How does SDG&E intend to verify if a Load Management Plan (LMP) is consistent with Settling Parties' Guiding Principles (Attachment A, p. 3)?

SDG&E Response:

As described on page 4, part B of Appendix A of the Settlement Agreement, the site host must submit their load management tactics (plans) in order to be eligible to participate in the VGI Program. After the VGI Facility is placed in-service, site usage patterns will be monitored and site host determined prices or fees will be tracked to measure effectiveness of the plans. These data will provide the necessary information concerning the impact of the load management plans, in line with the Guiding Principles, especially numbers 1, 2, 9, and 10, found on Pages 3 and 4 in the Appendix.

**ORA DATA REQUEST
ORA-SDG&E-DR-08
SDG&E VEHICLE GRID INTEGRATION PROJECT
A.14-04-014
SDG&E RESPONSE
DATE RECEIVED: JUNE 10, 2015
DATE RESPONDED: JUNE 24, 2015**

2. As outlined in Guiding Principle # 3 (Attachment A, p. 3), how will net benefits to ratepayers be measured (e.g. use of a cost-effectiveness model)?

SDG&E Response:

The cost effectiveness analysis in Ex. SDG&E 6 testimony of JC Martin captures the range of possible outcomes under the Agreement and thus no additional modeling analysis is needed. The analysis in Ex. SDG&E-6 contains two scenarios – EV charging with the VGI rate, and EV charging based on a flat rate. The Agreement adds an option for the site host to choose a VGI Rate-to-Host option (to the originally proposed option of VGI Rate-to-EV Driver). If the site host chooses the Rate-to-Host option, it must include a load management plan, consistent with the Agreement’s Guiding Principle that “must be structured to provide net benefits to all ratepayers”. By the Agreement introducing this choice to site hosts, it introduces the chance to explore the (1) the extent to which site hosts would prefer to get the VGI rate directly, and (2) how site hosts receiving the rate can creatively manage the load. The Agreement’s option allows the pilot to explore other approaches to encourage off-peak charging and charging at times of day when the price per hour is low. Even if a large portion of site hosts choose the VGI Rate-to-Host option, it is still expected that the modeled EV charging behavior described in the testimony of JC Martin would yield similar effects as those he modeled under the VGI Rate (which is the Agreement’s Rate to Driver option). The data yielded by the pilot should reveal customer preferences and the effectiveness of the VGI rate to affect driver charging behavior under both options in the Agreement.

ORA DATA REQUEST
ORA-SDG&E-DR-08
SDG&E VEHICLE GRID INTEGRATION PROJECT
A.14-04-014
SDG&E RESPONSE
DATE RECEIVED: JUNE 10, 2015
DATE RESPONDED: JUNE 24, 2015

3. What cost-effectiveness tests (i.e. ratepayer impact measure (RIM), total resource cost (TRC), and societal cost test (SCT)) will be used to measure ratepayer benefits?

SDG&E Response:

The RIM test is a measure of the VGI Program's impact on rates (one measure of ratepayer benefits). Other cost effectiveness tests such as TRC, SCT and Participant Cost Test (PCT) will also be provided to help assess cost effectiveness.

ORA DATA REQUEST
ORA-SDG&E-DR-08
SDG&E VEHICLE GRID INTEGRATION PROJECT
A.14-04-014
SDG&E RESPONSE
DATE RECEIVED: JUNE 10, 2015
DATE RESPONDED: JUNE 24, 2015

4. Will the RIM, TRC, and SCT values need to be above 1 in order for a VGI Rate-to-Host applicant's LMP will be accepted by SDG&E? (i.e., will the benefit to cost ratio need to be at least 1?)¹

SDG&E Response:

SDG&E has not proposed a cost-effectiveness ex-ante thresholds for acceptance of an applicant's LMP. As noted above in answers to 1, since the impacts of the LMP can be tracked over time, data will be available to analyze these effects. SDG&E understands that the Commission is interested in exploring the development of cost-effectiveness methodology and policy for transportation electrification related programs. Since the Commission has not yet established a protocol for measuring cost-effectiveness and thresholds cost-effectiveness for such programs, providing cost-effectiveness test results within SDG&E's VGI Program will help to further inform the Commission in this area of interest and policy development.

¹Note that the July 16, 2014 Assigned Commissioner's Scoping Memo and Ruling in the Alternative Fueled Vehicle Order Instituting Rulemaking (AFV OIR), R.13-11-007, asked 13 questions. Q.1-5 were related to Phase 1 of the proceeding. Parties only got a chance to answer these questions before R.13-11-007 was "put on hold." But Q.9 asked: "9. Should the Total Resource Cost (TRC) Test and the Program Administrator Cost Test (PAC) found in the Standard Practices Manual be applied to electric vehicles programs? Do these tests need modification to account for any costs or benefits that are unique to electric vehicles? In particular, does the Standard Practice Manual adequately list the appropriate costs included in evaluating an electric vehicle VGI program? Does the definition of avoided cost benefits require modification to capture value unique to electric vehicles?" These questions were never answered by stakeholders nor has the Commission considered them.

ORA DATA REQUEST
ORA-SDG&E-DR-08
SDG&E VEHICLE GRID INTEGRATION PROJECT
A.14-04-014
SDG&E RESPONSE
DATE RECEIVED: JUNE 10, 2015
DATE RESPONDED: JUNE 24, 2015

5. What tactics should the LMP include to “ensure that assets continue to be used and useful” (Attachment A, p. 3)?

SDG&E Response:

The range of load management tactics expected is best answered and demonstrated by a combination of site hosts and EV service providers who qualify to participate in the program. Any examples offered here by SDG&E are necessarily speculative, and cannot anticipate the range of creative approaches site hosts and EV service providers might employ. Those envisioned by SDG&E could include, but are certainly not limited to, the following examples (subject to confirmation by service providers and site hosts):

1. Requesting the service provider to power down the rate of charge (or curtail charging) for each EV during hours of the day with high pricing, and correspondingly, increasing the rate of charge during hours of the day with low pricing (as described in the answer to 5.b. above).
2. Sending an email alert to EV drivers who use a given VGI Facility to voluntarily avoid or limit charging during hours of the day with high pricing, and correspondingly, increasing the rate of charge during hours of the day with low pricing.
3. Integrating stationary energy storage system interconnected with the VGI Facility to provide the stored energy during hours of the day with high pricing, and correspondingly, increasing the rate of charge during hours of the day with low pricing.

ORA DATA REQUEST
ORA-SDG&E-DR-08
SDG&E VEHICLE GRID INTEGRATION PROJECT
A.14-04-014
SDG&E RESPONSE
DATE RECEIVED: JUNE 10, 2015
DATE RESPONDED: JUNE 24, 2015

6. How will SDG&E monitor the ability of a site host to ensure that EV charging stations are “used and useful”?

SDG&E Response:

As described in Appendix A and B of the Settlement Agreement on page 4, paragraph B, and in the answer to question 1 above, site usage patterns will be monitored (via the VGI Facility metered data) along with site host determined prices or fees to use the VGI facility.

ORA DATA REQUEST
ORA-SDG&E-DR-08
SDG&E VEHICLE GRID INTEGRATION PROJECT
A.14-04-014
SDG&E RESPONSE
DATE RECEIVED: JUNE 10, 2015
DATE RESPONDED: JUNE 24, 2015

7. What process will SDG&E employ to review LMPs?

SDG&E Response:

The settlement provides that the VGI price signal will be sent to the site host under the “VGI Rate-to-Host” option, providing an economic incentive for site hosts to manage load, and that site hosts will submit a load management plan as a condition of participation. A load management action or measure, when executed generally leads to charging patterns consistent with those modeled with a VGI Rate-to-EV Driver option, as originally proposed. That is, avoiding charging during hours of the day with high pricing, and preferring to charge during times of low pricing. This pricing as detailed in Ex. SDG&E-3 (Fang), reflect grid and circuit conditions, as well as the fluctuating energy prices throughout the day. This allows the site host to explore a variety of load management measures that respond to the price signal for the entire VGI Facility. Since this is a separate service, with separate metering, this not only allows SDG&E to bill the site host for the VGI Facility use, but to also study the diurnal load patterns of the entire VGI Facility in response to the price signal to the site host. As described in answers to question 6 below, the site host can consider ways to respond to the price signal with a load management measure or action, basically yielding data comparable to the VGI Rate-to-EV Driver option.

ORA DATA REQUEST
ORA-SDG&E-DR-08
SDG&E VEHICLE GRID INTEGRATION PROJECT
A.14-04-014
SDG&E RESPONSE
DATE RECEIVED: JUNE 10, 2015
DATE RESPONDED: JUNE 24, 2015

8. Is there an additional program cost associated with SDG&E's review of VGI Rate-to-Host LMPs?

SDG&E Response:

The VGI Program will not exceed the proposed \$103 million program cap on spending authority requested in the application. SDG&E will not build over the 550 charging stations if the spending cap is not reached with that rollout level. Schimka, T. 534:5-23 (April 29, 2015). VGI site hosts selecting the VGI Rate-to-Host option, as noted in Section III, modification paragraph B, will submit load management plans which will describe the expected load management effects. It is assumed that some of these plans will not have a cost impact and some may. As noted in modification paragraph F and in the last paragraph of Appendix C, if it is determined that such plans will yield results consistent with the objectives of the VGI Pilot Program, and in these cases these plans require additional costs to achieve these objectives, the VGI Pilot Program will cover these costs. This will shed light on alternative ways to achieve grid-integrated charging impacts by providing the VGI price signal to the host, who will in turn take affirmative action to respond to this price signal.

ORA DATA REQUEST
ORA-SDG&E-DR-08
SDG&E VEHICLE GRID INTEGRATION PROJECT
A.14-04-014
SDG&E RESPONSE
DATE RECEIVED: JUNE 10, 2015
DATE RESPONDED: JUNE 24, 2015

9. If there are additional program costs associated with SDG&E's review of the VGI Rate-to-Host LMPs would this entail additional labor, IT, or other related requirements? What are the specific resource requirements to implement this?

SDG&E Response:

Please see the response to Question 8 above.

ORA DATA REQUEST
ORA-SDG&E-DR-08
SDG&E VEHICLE GRID INTEGRATION PROJECT
A.14-04-014
SDG&E RESPONSE
DATE RECEIVED: JUNE 10, 2015
DATE RESPONDED: JUNE 24, 2015

10. How much time will SDG&E allow site hosts to demonstrate that the LMP results in grid benefits?

SDG&E Response:

SDG&E expects aggregate LMP results to be reported consistent with the schedule described in Revised Chapter 6, section Research Plan – Data Collection and Analysis (Ex. SDG&E-6 (Martin) p. JCM-35 line 9 – p. 37 line 13). Section III. P of the Settlement Agreement Provisions also describes the process around the interim progress report that SDG&E will provide.

ORA DATA REQUEST
ORA-SDG&E-DR-08
SDG&E VEHICLE GRID INTEGRATION PROJECT
A.14-04-014
SDG&E RESPONSE
DATE RECEIVED: JUNE 10, 2015
DATE RESPONDED: JUNE 24, 2015

11. Will SDG&E stop offering the VGI Rate-to-Host option if the SDG&E Approved LMP does not result in grid benefits?

SDG&E Response:

This pilot is intended to explore a variety of ways to achieve grid-integrated EV charging. The pilot will reveal whether and the extent to which load management plans yield expected results collectively and on an individual basis. SDG&E expects that the pilot will gather such data and will report its findings. As such, SDG&E will exercise reasonable discretion, but does not intend to disqualify a VGI site host from further participation in the program at this time.

**ORA DATA REQUEST
ORA-SDG&E-DR-08
SDG&E VEHICLE GRID INTEGRATION PROJECT
A.14-04-014
SDG&E RESPONSE
DATE RECEIVED: JUNE 10, 2015
DATE RESPONDED: JUNE 24, 2015**

12. What is SDG&E's method for identifying if LMPs are not resulting in grid benefits?

SDG&E Response:

SDG&E expects aggregate LMP impacts to be analyzed and reported consistent with the description found in Ex. SDG&E-6 (Martin) p. JCM-35 line 9 – p. 37 line 13 (Revised Chapter 6, section describing the Research Plan – Data Collection And Analysis), and supplemented with the data collection and analysis described in Appendix B of the Settlement Agreement.

ORA DATA REQUEST
ORA-SDG&E-DR-08
SDG&E VEHICLE GRID INTEGRATION PROJECT
A.14-04-014
SDG&E RESPONSE
DATE RECEIVED: JUNE 10, 2015
DATE RESPONDED: JUNE 24, 2015

13. If SDG&E approves a LMP, but EV drivers are still charging at any hour, what is SDG&E's strategy to mitigate the issue?

SDG&E Response:

One of the purposes of the pilot, especially with the VGI Rate-to-Host option, is to observe the effectiveness of a variety of load management tactics – some may be effective and some may not – viewed individually and in aggregate, over time – immediate mitigation may not be the best course of action. There needs to be sufficient time given to site hosts to be demonstrated the effectiveness of their LMP.

**ORA DATA REQUEST
ORA-SDG&E-DR-08
SDG&E VEHICLE GRID INTEGRATION PROJECT
A.14-04-014
SDG&E RESPONSE
DATE RECEIVED: JUNE 10, 2015
DATE RESPONDED: JUNE 24, 2015**

14. What criteria will SDG&E use to evaluate and qualify third-party vendors of EV supply equipment and services?

SDG&E Response:

These criteria are described in Ex. SDG&E-2 (Schimka) p. RS-8 lines 1 to RS-9 line 20, and RS-19 lines 1 – 22, and in the Settlement Agreement provisions found in paragraphs F, G, H and J, and in Appendix C.

ORA DATA REQUEST
ORA-SDG&E-DR-08
SDG&E VEHICLE GRID INTEGRATION PROJECT
A.14-04-014
SDG&E RESPONSE
DATE RECEIVED: JUNE 10, 2015
DATE RESPONDED: JUNE 24, 2015

15. How will SDG&E pay for “innovative opportunities that may exceed the minimum implementation requirements of the VGI program” if such opportunities exceed the program’s budget?

SDG&E Response:

This question is referring to the last sentence in modification F in the settlement that states, “...SDG&E will encourage discussions during the RFI process that allow vendors to explore with SDG&E the funding of innovative opportunities that may exceed the minimum implementation requirements of the VGI Program, and have the potential to enhance and improve the grid-integration outcomes of the VGI Program overall.”

With guidance from the PAC, SDG&E will explore such opportunities in light of the Guiding Principles. It is important to note that benefits will be evaluated against program costs, and if it is determined, for example, through the LMPs, that certain approaches yield enhanced benefits (e.g., beyond those hypothesized), and these are determined to be cost-effective, then the pilot will provide an additional learning experience and help to further inform Commission policy. Opportunities that enhance and improve the Pilot will be met within the program budget.

**ORA DATA REQUEST
ORA-SDG&E-DR-08
SDG&E VEHICLE GRID INTEGRATION PROJECT
A.14-04-014
SDG&E RESPONSE
DATE RECEIVED: JUNE 10, 2015
DATE RESPONDED: JUNE 24, 2015**

16. Please attach a copy of SDG&E's Supply Management Policy and procedures.

SDG&E Response:

See attached - *Pursuant to PU Code Section 583 and General Order 66-C, the attachments contain confidential information and are protected from disclosure.*

REMOVED DUE TO CONFIDENTIALITY

ORA DATA REQUEST
ORA-SDG&E-DR-08
SDG&E VEHICLE GRID INTEGRATION PROJECT
A.14-04-014
SDG&E RESPONSE
DATE RECEIVED: JUNE 10, 2015
DATE RESPONDED: JUNE 24, 2015

17. How will SDG&E ensure that “all contractors have hiring goals to support opportunities to increase hiring from Disadvantaged Communities”?

SDG&E Response:

This will be handled during the RFP process by SDG&E’s Supply Management group. Potential bidders will respond to this requirement, and those responses will be evaluated as part of the selection process.

**ORA DATA REQUEST
ORA-SDG&E-DR-08
SDG&E VEHICLE GRID INTEGRATION PROJECT
A.14-04-014
SDG&E RESPONSE
DATE RECEIVED: JUNE 10, 2015
DATE RESPONDED: JUNE 24, 2015**

18. How much will SDG&E charge for program participation fees? If SDG&E has not determined a specific amount, please specify a range.

SDG&E Response:

This has not yet been determined. The Settlement Agreement, ¶ III. D. describes the process for determining the amount of program participation fees.

ORA DATA REQUEST
ORA-SDG&E-DR-08
SDG&E VEHICLE GRID INTEGRATION PROJECT
A.14-04-014
SDG&E RESPONSE
DATE RECEIVED: JUNE 10, 2015
DATE RESPONDED: JUNE 24, 2015

19. What role will the VGI Program Advisory Council play in the development of SDG&E's methodology for developing program participant fees?

SDG&E Response:

The roles and responsibilities of the PAC are described in Appendix A of the settlement agreement.

ORA DATA REQUEST
ORA-SDG&E-DR-08
SDG&E VEHICLE GRID INTEGRATION PROJECT
A.14-04-014
SDG&E RESPONSE
DATE RECEIVED: JUNE 10, 2015
DATE RESPONDED: JUNE 24, 2015

20. Who will determine which programmatic changes are needed during the course of the VGI Program?

SDG&E Response:

SDG&E will determine which programmatic changes are needed during the course of the VGI program, with input from the VGI Program Advisory Council as described in Appendix A of the Settlement agreement, as stated in the second paragraph, “Overall, the key role and purpose of the PAC will be to provide input to SDG&E for programmatic changes as needed during the course of the VGI Program (e.g., VGI Rate – as originally proposed, or with VGI host site prioritization for an equitable deployment of VGI Facilities), to improve the performance of the VGI Program, in line with the Guiding Principles and consistent with any applicable Commission orders, tariff rules, regulations, etc. SDG&E will give careful consideration to all programmatic modifications recommended by the PAC at their meetings and implement such changes deemed feasible and necessary. Programmatic changes will be made on an on-going basis, running concurrent with the VGI Program, so as not to impact its overall progress.”

ORA DATA REQUEST
ORA-SDG&E-DR-08
SDG&E VEHICLE GRID INTEGRATION PROJECT
A.14-04-014
SDG&E RESPONSE
DATE RECEIVED: JUNE 10, 2015
DATE RESPONDED: JUNE 24, 2015

21. Upon what criteria will this decision be made?

SDG&E Response:

SDG&E doesn't understand what this question is referencing (that is, "this decision"). If the ORA is referring to decisions about program modifications, this is described in section III., paragraphs K and L, and in Appendix A and B of the Settlement Agreement.

ORA DATA REQUEST
ORA-SDG&E-DR-08
SDG&E VEHICLE GRID INTEGRATION PROJECT
A.14-04-014
SDG&E RESPONSE
DATE RECEIVED: JUNE 10, 2015
DATE RESPONDED: JUNE 24, 2015

22. What VGI program costs (i.e. capital, O&M) will be defrayed by program participant fees?

SDG&E Response:

Proceeds from the program participation payment will be credited to the program balancing account described in Ex. SDG&E-5 (Jasso).

ORA DATA REQUEST
ORA-SDG&E-DR-08
SDG&E VEHICLE GRID INTEGRATION PROJECT
A.14-04-014
SDG&E RESPONSE
DATE RECEIVED: JUNE 10, 2015
DATE RESPONDED: JUNE 24, 2015

23. If third parties must agree to SDG&E's VGI program co-branding policy, how may third party marketing, education, and outreach costs defray VGI program costs?

SDG&E Response:

These actions are optional and in addition to those planned by SDG&E (see Ex. SDG&E-2 (Schimka) p. RS-16 line 16 – p. RS-17 line 3). Per ¶ III. G of the Settlement Agreement, such costs will be borne by third parties. They will not be used to defray other program costs.

**ORA DATA REQUEST
ORA-SDG&E-DR-08
SDG&E VEHICLE GRID INTEGRATION PROJECT
A.14-04-014
SDG&E RESPONSE
DATE RECEIVED: JUNE 10, 2015
DATE RESPONDED: JUNE 24, 2015**

24. Please attach a copy of SDG&E's Co-branding policy.

SDG&E Response:

See attached - *Pursuant to PU Code Section 583 and General Order 66-C, the attachment contains confidential information and is protected from disclosure.*

REMOVED DUE TO CONFIDENTIALITY

**ORA DATA REQUEST
ORA-SDG&E-DR-08
SDG&E VEHICLE GRID INTEGRATION PROJECT
A.14-04-014
SDG&E RESPONSE
DATE RECEIVED: JUNE 10, 2015
DATE RESPONDED: JUNE 24, 2015**

25. What standards and or principles will SDG&E employ when determining what VGI program costs will be defrayed by program participant fees?

SDG&E Response:

See answers to Questions 18 and 19 above. As stated in paragraph D in the Settlement Agreement, “In developing the proposed participation payment, factors that will be considered include, but are not limited, to the following: customer commitment, avoiding adverse impacts to deployment, total VGI Facility cost and customer segment.” Paragraph D also describes an important step in the process, “SDG&E shall file for approval of the proposed participation payment by way of a Tier 2 advice letter, subject to protest by any party, after consulting with the VGI Program Advisory Council.”

ORA DATA REQUEST
ORA-SDG&E-DR-08
SDG&E VEHICLE GRID INTEGRATION PROJECT
A.14-04-014
SDG&E RESPONSE
DATE RECEIVED: JUNE 10, 2015
DATE RESPONDED: JUNE 24, 2015

26. How will EV drivers see the VGI rate under a VGI Rate-to-Host scenario?

SDG&E Response:

Under the VGI Rate-to-Host, the host is not obligated to pass through the VGI Rate as is to the EV driver. Instead, the host may pursue alternative approaches (described in answers to question 5 above), including technology or pricing solutions. As long as a load management is executed by the host as planned, then grid benefits can be accounted for.

ORA DATA REQUEST
ORA-SDG&E-DR-08
SDG&E VEHICLE GRID INTEGRATION PROJECT
A.14-04-014
SDG&E RESPONSE
DATE RECEIVED: JUNE 10, 2015
DATE RESPONDED: JUNE 24, 2015

27. If VGI Rate-to-Host customers wish to offer EV drivers a flat EV charging fee or free EV charging, how does this comport with the stipulation that additional or complementary services “shall not include activities, arrangements, agreements, policies or procedures that inhibit the ability of the EV driver or VGI facility host to respond to the pricing signal of the VGI rate”?

SDG&E Response:

If a VGI Rate-to-Host customer wishes to offer EV drivers a flat EV charging fee or free EV charging, the VGI facility host can still respond to the VGI rate pricing signal and implement their load management plans to manage charging loads of the entire (separately metered) VGI Facility consistent with the objectives of the VGI Program. For example, a LMP designed to avoid charging during hours of the day with high pricing, and giving preference to charging during times with low pricing. This pricing as detailed in Ex. SDG&E-3 (Fang), reflect grid and circuit conditions, as well as the fluctuating energy prices throughout the day. This allows the site host to explore a variety of load management measures that respond to the price signal for the entire VGI Facility. Answers to question 5 offer some illustrative examples of how this can be achieved.

ORA DATA REQUEST
ORA-SDG&E-DR-08
SDG&E VEHICLE GRID INTEGRATION PROJECT
A.14-04-014
SDG&E RESPONSE
DATE RECEIVED: JUNE 10, 2015
DATE RESPONDED: JUNE 24, 2015

28. If SDG&E is capable of offering a VGI Rate-to-Host option to customers why is SDG&E required to own the EV charging stations?

SDG&E Response:

The VGI Rate-to Driver or VGI Rate-to-Host options are identical in terms of addressing Guiding Principles outlined in Section III of the Settlement agreement Provisions, and specifically, the following:

1. Support the Governor's and California state goals to achieve installation of grid-integrated infrastructure to support 1 million zero emission vehicles by 2020,
2. Provide net benefits to all ratepayers,
3. Protect ratepayers by ensuring that assets continue to be used and useful, and 10. Utilize rate design and load management practices to facilitate the integration of renewable energy resources, as well as deliver other grid benefits.

If all ratepayers are funding the VGI Program, then it is incumbent upon SDG&E to protect all ratepayers by ensuring that these assets remain used and useful to achieve the net benefits proposed by the VGI Program.

ORA DATA REQUEST
ORA-SDG&E-DR-08
SDG&E VEHICLE GRID INTEGRATION PROJECT
A.14-04-014
SDG&E RESPONSE
DATE RECEIVED: JUNE 10, 2015
DATE RESPONDED: JUNE 24, 2015

29. What is SDG&E's proposal to inform the Commission regarding the performance of the VGI program prior to filing the Interim Progress Report after 2 years?

SDG&E Response:

Please see Revised Chapter 6 section Research Plan – Data Collection and Analysis (Ex. SDG&E-6 (Martin) p. JCM-35 line 9 – p. 37 line 13) and the provisions of the Settlement Agreement regarding supplemental obligations to the PAC for reporting VGI Program performance in Appendix A and Appendix B in the settlement agreement, as well as paragraph P in the settlement agreement provisions.

ORA DATA REQUEST
ORA-SDG&E-DR-08
SDG&E VEHICLE GRID INTEGRATION PROJECT
A.14-04-014
SDG&E RESPONSE
DATE RECEIVED: JUNE 10, 2015
DATE RESPONDED: JUNE 24, 2015

30. According to Appendix A, the VGI Program Advisory Council “does not have formal decision making authority”. Given that the Commission does have decision making authority, what is the process for providing near-term (e.g. one year after VGI program deployment) data and findings to inform the Commission prior to making a decision (e.g. VGI program modification, suspension or termination)?

SDG&E Response:

Please see Revised Chapter 6 section Research Plan – Data Collection and Analysis (Ex. SDG&E-6 (Martin) p. JCM-35 line 9 – p. 37 line 13) and the provisions of the Settlement Agreement regarding supplemental obligations to the PAC for reporting VGI Program performance in Appendix A and Appendix B in the Settlement Agreement, as well as paragraph P in the Settlement Agreement provisions. As noted in Appendix A, the program review and program modification protocol should not impact the overall progress of the program.

ORA DATA REQUEST
ORA-SDG&E-DR-08
SDG&E VEHICLE GRID INTEGRATION PROJECT
A.14-04-014
SDG&E RESPONSE
DATE RECEIVED: JUNE 10, 2015
DATE RESPONDED: JUNE 24, 2015

31. Given the requirement to abide by Commission policies on data privacy, what is the process for SDG&E to release VGI program data to the Commission before the Interim Progress report is filed?

SDG&E Response:

Please see Revised Chapter 6 section Research Plan – Data Collection and Analysis (Ex. SDG&E-6 (Martin) p. JCM-35 lines 16-18, which describes SDG&E’s research plan and associated reporting timeframes. SDG&E intends to begin data collection during the first year of the Pilot. As described in Appendix A of the settlement, SDG&E will share data with the PAC on an on-going basis consistent with all applicable rules and laws to protect customer privacy and commercially sensitive information. As noted in settlement agreement provision paragraph K, SDG&E will solicit participation of a broad and diverse stakeholder advisory group, including “representatives from local and state government (including representation for the Energy Division)...”.

ORA DATA REQUEST
ORA-SDG&E-DR-08
SDG&E VEHICLE GRID INTEGRATION PROJECT
A.14-04-014
SDG&E RESPONSE
DATE RECEIVED: JUNE 10, 2015
DATE RESPONDED: JUNE 24, 2015

32. What standards or thresholds will SDG&E utilize in order to determine what additional services offered by third party vendors constitute “complementary services necessary to support” the objectives of the VGI Pilot Program?

SDG&E Response:

The section quoted above is a partial reference and does not convey the full context and the intentions of part F, which states, “Third party vendors of EV supply equipment and services pre-qualified by SDG&E for the VGI Program may offer and contract with the VGI Facility site host to provide any additional or complementary services, as long as these services do not interfere with the objectives of the VGI Program.” The “additional or complementary services” will be those offered by vendors pre-qualified by SDG&E to help meet the objectives of the VGI Program in line with the Guiding Principles of the Settlement Agreement. The types of services envisioned are best answered by those vendors, once they are qualified to participate. The purpose of part F is to foster the development and provision of innovative services to site hosts and EV drivers that potentially can have a positive impact on the VGI Program, make it more attractive to site hosts, and improve the overall program experience.

ORA DATA REQUEST
ORA-SDG&E-DR-08
SDG&E VEHICLE GRID INTEGRATION PROJECT
A.14-04-014
SDG&E RESPONSE
DATE RECEIVED: JUNE 10, 2015
DATE RESPONDED: JUNE 24, 2015

33. Beyond receiving input from the VGI Program Advisory Council, what policies, processes and procedures does SDG&E plan on utilizing to identify potential programmatic changes to the VGI Program that may be necessary?

SDG&E Response:

SDG&E seeks to encourage broad and diverse stakeholder participation over the four years of the program, as stated in the opening paragraph of Appendix A to the Agreement, “SDG&E will solicit the participation of a broad and diverse stakeholder VGI Program Advisory Group (“VGI Program Advisory Council” or “PAC”) in the planning and implementing the VGI Program, once it has been approved by the Commission. This independent advisory council will include representatives from local and state government (including representation from the Energy Division), industry and other stakeholders, ratepayer and environmental advocates, and representation from Disadvantaged Communities.” As described, the PAC then will provide a robust forum upon which SDG&E can rely to assist with “potential programmatic changes to the VGI Program that may be necessary.” SDG&E listens to its customers, stakeholder groups and communities as part of its daily operations. Any useful feedback regarding the performance of the VGI Program will be taken into consideration, and certainly shared with the PAC.

ORA DATA REQUEST
ORA-SDG&E-DR-08
SDG&E VEHICLE GRID INTEGRATION PROJECT
A.14-04-014
SDG&E RESPONSE
DATE RECEIVED: JUNE 10, 2015
DATE RESPONDED: JUNE 24, 2015

34. Describe the “commitment” that the site host must make by the end of year 4 to qualify for VGI Program proposed installation beyond the 5th year of the program.

SDG&E Response:

This question appears to be referring to paragraph N in the settlement agreement which states, “Unless directed otherwise by the Commission, as originally proposed SDG&E will cease marketing the VGI Program and will not sign up any additional sites as of the end of the 4th year of VGI Program implementation, **except for the limited exception described in this paragraph. The original proposal is modified for potential VGI Facilities sites with documented plans for new construction or major tenant improvements. For such sites the VGI Facility installation period may extend beyond the 5th year of the VGI Program proposed installation period if the site host commitment is made by the end of the 4th year of VGI Program implementation.**” (emphasis added) The “commitment” by the site host in such cases will be identical to the commitment made by other sites hosts participating in the VGI Program, and in such cases, with some documentation of the planned scope of construction, schedule and relevant support material.