

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE



May 11, 2020

Advice Letter 5668-E and 5668-E-A

Erik Jacobson
Director, Regulatory Relations
Pacific Gas and Electric Company
77 Beale Street, Mail Code B10C
P.O. Box 770000
San Francisco, CA 94177

SUBJECT: Joint IOU Submissions of VGI Working Group Facilitator Updates in Compliance with Ordering Paragraph (OP) 7 of R.18-12-006.

Dear Mr. Jacobson:

Advice Letter Advice Letter 5668-E and 5668-E-A is effective as of November 24, 2019.

Sincerely,

A handwritten signature in cursive script that reads "Edward Randolph".

Edward Randolph
Deputy Executive Director for Energy and Climate Policy/
Director, Energy Division



Clay Faber - Director
Federal & CA Regulatory
8330 Century Park Court
San Diego, CA 92123

cfaber@sdge.com

October 25, 2019

ADVICE LETTER 3446-E

(San Diego Gas & Electric Company - U902-E)

ADVICE LETTER 5668-E

(Pacific Gas and Electric Company – U39-E)

ADVICE LETTER 4093-E

(Southern California Edison Company – U338-E)

PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

SUBJECT: Joint IOU Submittal - Submission of VGI Working Group Facilitator Updates in Compliance with Ordering Paragraph (OP) 7 of R.18-12-006

San Diego Gas & Electric Company (SDG&E), Pacific Gas & Electric Company (PG&E), and Southern California Edison Company (SCE) hereby submit this advice letter for approval to the California Public Utilities Commission (Commission) of the estimated cost of a six-month working group, the selected facilitator, and a plan to provide regular updates to the service list.

PURPOSE

Pursuant to Ordering Paragraph (OP) 7 of the Assigned Commissioner's Scoping Memo and Ruling (Ruling) in Rulemaking (R.) 18-12-006, SDG&E hereby submits this Advice Letter (AL) for approval by the Commission of the estimated cost of a six-month working group, the selected facilitator, and a plan to provide regular updates to the service list.

BACKGROUND

In continuation of the development of rates and infrastructure for vehicle electrification, on May 2, 2019, a Ruling in R.18-12-006 was issued directing PG&E, SDG&E, and SCE (collectively, the IOUs), to develop a solicitation to select a technical facilitator to lead the VGI Working Group (WG) in consultation with the Commission's Energy Division. Pursuant to OP 7 of the Ruling, the technical facilitator was required to be hired no later than June 1, 2019 and would be tasked with organizing and facilitating the interagency VGI WG.

On May 22, 2019, the IOUs filed an extension of time to comply with OP 7 of the Ruling. On June 3, 2019, the Commission's Executive Director approved the IOUs' request for additional time to complete the facilitator selection deadline to August 1, 2019.

On July 1, 2019, SDG&E filed AL 3387-E requesting authority to establish the Working Group Facilitator Memorandum Account (WGFMA). AL 3387-E was approved and is effective as of July 31, 2019.

Discussion

As detailed in the Ruling in R.18-12-006, the scope of the VGI WG will, at a minimum, cover:

- a) What VGI use cases can provide value now, and how can that value be captured?
- b) What policies need to be changed or adopted to allow additional use cases to be deployed in the future?
- c) How do the value of VGI use cases compare to other storage of Distributed Energy Resources?

In order to select the VGI WG facilitator, the IOUs conducted an open Request for Proposal (RFP). The RFP was to select a facilitator for the VGI WG as described in the Ruling, including organizing meetings, taking and distributing meeting minutes, documenting stakeholder positions, and leading the authoring of the interim progress reports and the final WG report.

The IOUs solicited 20 organizations to submit bids for this work. The IOUs evaluated the submitted bids to select the most competitive bids for a second round of evaluation in the form of interviews.

The contract was awarded to Gridworks Organization (Gridworks or the Facilitator). SDG&E and Gridworks signed a Standard Services Agreement (Agreement) dated and effective as of August 1, 2019, at a Not to Exceed amount of \$ [REDACTED], an amount derived from the RFP described above. The contracted rates offered by Gridworks is consistent with market rates for similar work and Gridworks has committed to providing detailed descriptions of the work performed for each cost incurred. The costs will be shared by the IOUs, per the Ruling.

The IOUs and the Facilitator will provide a progress report on the VGI WG and additional ongoing quarterly reports as required to the Assigned Administrative Law Judges, the assigned Commissioner, and the full Service List for R.18-12-006.

EFFECTIVE DATE

SDG&E believes this joint submittal is subject to Energy Division disposition and should be classified as Tier 2 (effective after staff approval) pursuant to GO 96-B. SDG&E respectfully requests that this submittal be approved effective November 24, 2019, which is 30 days from the date submitted.

PROTEST

Anyone may protest this Advice Letter to the Commission. The protest must state the grounds upon which it is based, including such items as financial and service impact, and should be submitted expeditiously. The protest must be made in writing and must be received no later than November 14, 2019, which is 20 days after the date this Advice Letter was submitted with the Commission. There is no restriction on who may submit a protest. The address for mailing or delivering a protest to the Commission is:

CPUC Energy Division
Attention: Tariff Unit
505 Van Ness Avenue
San Francisco, CA 94102

Copies of the protest should also be sent via e-mail to the attention of the Energy Division at EDTariffUnit@cpuc.ca.gov. A copy of the protest should also be sent via e-mail to the address shown below on the same date it is mailed or delivered to the Commission.

For SDG&E: Megan Caulson
Regulatory Tariff Manager
8330 Century Park Court, CP31F
San Diego, CA 92123-1548
E-mail: mcaulson@semprautilities.com

For SCE: Gary A. Stern, Ph.D.
Managing Director, State Regulatory Operations
Southern California Edison Company
8631 Rush Street
Rosemead, California 91770
Telephone: (626) 302-9645
Facsimile: (626) 302-6396
E-mail: AdviceTariffManager@sce.com

Laura Genao
Managing Director, State Regulatory Affairs
c/o Karyn Gansecki
Southern California Edison Company
601 Van Ness Avenue, Suite 2030
San Francisco, California 94102
Facsimile: (415) 929-5544
E-mail: Karyn.Gansecki@sce.com

For PG&E: Erik Jacobson
Director, Regulatory Relations
c/o Megan Lawson
Pacific Gas and Electric Company
77 Beale Street, Mail Code B13U
P.O. Box 770000
San Francisco, California 94177
Facsimile: (415) 973-3582
E-mail: PGETariffs@pge.com

EFFECTIVE DATE

This submission is subject to Energy Division disposition and is classified as Tier 2 (effective pending disposition) pursuant to GO 96-B. SDG&E respectfully requests that this submission become effective on November 24, 2019, which is 30 days from the date of this submission.

NOTICE

A copy of this submission has been served on the utilities and interested parties shown on the attached list and to interested parties in service list R.18-12-006, by providing them a copy hereof either electronically or via the U.S. mail, properly stamped and addressed.

Address changes should be directed to SDG&E Tariffs by email to SDG&ETariffs@sdge.com

CLAY FABER
Director – Federal & CA Regulatory



ADVICE LETTER SUMMARY

ENERGY UTILITY



MUST BE COMPLETED BY UTILITY (Attach additional pages as needed)

Company name/CPUC Utility No.: San Diego Gas & Electric Company (U902-E)

Utility type:

- ELC GAS WATER
 PLC HEAT

Contact Person: Aurora Carrillo

Phone #: (858) 654-1542

E-mail: acarrillo@sdge.com

E-mail Disposition Notice to: acarrillo@sdge.com

EXPLANATION OF UTILITY TYPE

ELC = Electric GAS = Gas WATER = Water
 PLC = Pipeline HEAT = Heat

(Date Submitted / Received Stamp by CPUC)

Advice Letter (AL) #: 3446-E

Tier Designation: 2

Subject of AL: Joint IOU Submissions of VGI Working Group Facilitator Updates in Compliance with Ordering Paragraph 7 of R.18-12-006

Keywords (choose from CPUC listing): Clean Transportation

AL Type: Monthly Quarterly Annual One-Time Other:

If AL submitted in compliance with a Commission order, indicate relevant Decision/Resolution #:

Does AL replace a withdrawn or rejected AL? If so, identify the prior AL: N/A

Summarize differences between the AL and the prior withdrawn or rejected AL: N/A

Confidential treatment requested? Yes No

If yes, specification of confidential information: See Attachment Confidential Declaration
 Confidential information will be made available to appropriate parties who execute a
 nondisclosure agreement. Name and contact information to request nondisclosure agreement/
 access to confidential information:

Resolution required? Yes No

Requested effective date: 11/24/19

No. of tariff sheets: N/A

Estimated system annual revenue effect (%): N/A

Estimated system average rate effect (%): N/A

When rates are affected by AL, include attachment in AL showing average rate effects on customer classes (residential, small commercial, large C/I, agricultural, lighting).

Tariff schedules affected: N/A

Service affected and changes proposed¹: N/A

Pending advice letters that revise the same tariff sheets: N/A

¹Discuss in AL if more space is needed.

Protests and all other correspondence regarding this AL are due no later than 20 days after the date of this submittal, unless otherwise authorized by the Commission, and shall be sent to:

CPUC, Energy Division
Attention: Tariff Unit
505 Van Ness Avenue
San Francisco, CA 94102
Email: EDTariffUnit@cpuc.ca.gov

Name: Megan Caulson
Title: Regulatory Tariff Manager
Utility Name: San Diego Gas & Electric Company
Address: 8330 Century Park Court; CP 31D 92123
City: San Diego State: California
Telephone (xxx) xxx-xxxx: (858) 654-1748
Facsimile (xxx) xxx-xxxx:
Email: MCaulson@sdge.com

Name: SDG&E Tariff Department
Title:
Utility Name: San Diego Gas & Electric Company
Address: 8330 Century Park Court; CP 31D 92123
City: San Diego State: California
Telephone (xxx) xxx-xxxx:
Facsimile (xxx) xxx-xxxx:
Email: SDGETariffs@sdge.com

General Order No. 96-B
ADVICE LETTER SUBMITTAL MAILING LIST

cc: (w/enclosures)

Public Utilities Commission

Office of Ratepayer Advocates (ORA)

R. Pocta

Energy Division

M. Ghadessi

M. Salinas

L. Tan

R. Ciupagea

Tariff Unit

CA Energy Commission

B. Penning

B. Helft

Advantage Energy

C. Farrell

Alcantar & Kahl LLP

M. Cade

K. Harteloo

AT&T

Regulatory

Barkovich & Yap, Inc.

B. Barkovich

Braun & Blasing, P.C.

S. Blasing

D. Griffiths

Buchalter

M. Alcantar

K. Cameron

CA Dept. of General Services

H. Nanjo

California Energy Markets

General

California Farm Bureau Federation

K. Mills

California Wind Energy

N. Rader

City of Poway

Poway City Hall

City of San Diego

F. Ortlieb

B. Henry

L. Azar

Y. Lu

Clean Power Research

T. Schmid

G. Novotny

Davis Wright Tremaine LLP

J. Pau

Douglass & Liddell

D. Douglass

D. Liddell

Ellison Schneider Harris & Donlan LLP

E. Janssen

C. Kappel

Energy Policy Initiatives Center (USD)

S. Anders

Energy Regulatory Solutions Consultants

L. Medina

Energy Strategies, Inc.

K. Campbell

EQ Research

General

Goodin, MacBride, Squeri, & Day LLP

B. Cragg

J. Squeri

Green Charge

K. Lucas

Hanna and Morton LLP

N. Pedersen

JBS Energy

J. Nahigian

Keyes & Fox, LLP

B. Elder

Manatt, Phelps & Phillips LLP

D. Huard

R. Keen

McKenna, Long & Aldridge LLP

J. Leslie

Morrison & Foerster LLP

P. Hanschen

MRW & Associates LLC

General

NLine Energy

M. Swindle

NRG Energy

D. Fellman

Pacific Gas & Electric Co.

M. Lawson

M. Huffman

Tariff Unit

RTO Advisors

S. Mara

SCD Energy Solutions

P. Muller

Shute, Mihaly & Weinberger LLP

O. Armi

Solar Turbines

C. Frank

SPURR

M. Rochman

Southern California Edison Co.

K. Gansecki

TerraVerde Renewable Partners LLC

F. Lee

TURN

M. Hawiger

UCAN

D. Kelly

US Dept. of the Navy

K. Davoodi

US General Services Administration

D. Bogni

Valley Center Municipal Water Distr

G. Broomell

Western Manufactured Housing
Communities Association

S. Dey

Interested Parties in:

R.18-12-006

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

**DECLARATION OF ESTELLA ADE LLANOS
REGARDING CONFIDENTIALITY OF CERTAIN DATA/DOCUMENTS
PURSUANT TO D.16-08-024**

I, Estela de Llanos, do declare as follows:

1. I am the Vice President of Clean Transportation, Sustainability & Chief Environmental Officer for San Diego Gas & Electric (“SDG&E”). I have reviewed SDG&E’s Advice Letter 3446-E, Submitting VGI Working Group Updates. I am personally familiar with the facts in this Declaration and, if called upon to testify, I could and would testify to the following based upon my personal knowledge and/or information and belief.

2. I hereby provide this Declaration in accordance with Decision (“D.”) 16-08-024 to demonstrate that the grey highlighted information (“Protected Information”) provided in AL 3446-E is within the scope of data protected as confidential under applicable law.

3. In accordance with the legal citations and narrative justification described in Attachment A, the Protected Information should be protected from public disclosure.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct to the best of my knowledge.

Executed this 23rd day of October 2019, at San Diego, CA.



Estela de Llanos
San Diego Gas & Electric
Vice President of Clean
Transportation, Sustainability &
Chief Environmental Officer

**SDG&E Request for Confidentiality
on the following information in AL 3446-E**

Location of Protected Information	Legal Citations	Narrative Justification
AL 3446-E Grey Highlighted Information.	<p>CA Public Records Act Exemption, Gov't Code § 6254(k) ("Records, the disclosure of which is exempted or prohibited pursuant to federal or state law")</p> <ul style="list-style-type: none"> • <i>See, e.g.</i>, D.11-01-036, 2011 WL 660568 (2011) (agreeing that confidential prices and contract terms specifically negotiated with a program vendor is proprietary and commercially sensitive and should remain confidential) • <i>Valley Bank of Nev. v. Superior Court</i>, 15 Cal.3d 652, 658 (1975) (financial information is protected – especially of non-parties) 	<p>Based on input received by Gridworks, and based on SDG&E's concurring position, the highlighted information represents vendor bid and pricing data, which is proprietary and includes content not intended for public disclosure, including commercially sensitive, and trade secret information. Public disclosure would pose potential negative impacts and/or harm to Gridworks.</p>

**PG&E Gas and Electric
Advice Submittal List
General Order 96-B, Section IV**

AT&T	Downey & Brand	Pioneer Community Energy
Albion Power Company	East Bay Community Energy	Praxair
Alcantar & Kahl LLP	Ellison Schneider & Harris LLP	
	Energy Management Service	
Alta Power Group, LLC	Engineers and Scientists of California	Redwood Coast Energy Authority
Anderson & Poole	Evaluation + Strategy for Social Innovation	Regulatory & Cogeneration Service, Inc.
	GenOn Energy, Inc.	SCD Energy Solutions
Atlas ReFuel	Goodin, MacBride, Squeri, Schlotz & Ritchie	SCE
BART	Green Charge Networks	SDG&E and SoCalGas
	Green Power Institute	
Barkovich & Yap, Inc.	Hanna & Morton	SPURR
P.C. CalCom Solar	ICF	San Francisco Water Power and Sewer
California Cotton Ginners & Growers Assn	International Power Technology	Seattle City Light
California Energy Commission	Intestate Gas Services, Inc.	Sempra Utilities
California Public Utilities Commission	Kelly Group	Southern California Edison Company
California State Association of Counties	Ken Bohn Consulting	Southern California Gas Company
Calpine	Keyes & Fox LLP	Spark Energy
	Leviton Manufacturing Co., Inc. Linde	Sun Light & Power
Cameron-Daniel, P.C.	Los Angeles County Integrated Waste Management Task Force	Sunshine Design
Casner, Steve	Los Angeles Dept of Water & Power	Tecogen, Inc.
Cenergy Power	MRW & Associates	TerraVerde Renewable Partners
Center for Biological Diversity	Manatt Phelps Phillips	Tiger Natural Gas, Inc.
City of Palo Alto	Marin Energy Authority	
	McKenzie & Associates	TransCanada
City of San Jose	Modesto Irrigation District	Troutman Sanders LLP
Clean Power Research	Morgan Stanley	Utility Cost Management
Coast Economic Consulting	NLine Energy, Inc.	Utility Power Solutions
Commercial Energy	NRG Solar	Utility Specialists
County of Tehama - Department of Public Works		Verizon
Crossborder Energy	Office of Ratepayer Advocates	Water and Energy Consulting Wellhead Electric Company
Crown Road Energy, LLC	OnGrid Solar	Western Manufactured Housing Communities Association (WMA)
Davis Wright Tremaine LLP	Pacific Gas and Electric Company	Yep Energy
Day Carter Murphy	Peninsula Clean Energy	
Dept of General Services		
Don Pickett & Associates, Inc.		
Douglass & Liddell		