

PUBLIC UTILITIES COMMISSION
505 Van Ness Avenue
San Francisco CA 94102-3298



Pacific Gas & Electric Company
ELC (Corp ID 39)
Status of Advice Letter 5772E
As of April 30, 2020

Subject: Defining Grace Periods, Overage Fees and Data Use in Pacific Gas and Electric Company's Commercial Electric Vehicle Rate

Division Assigned: Energy

Date Filed: 02-28-2020

Date to Calendar: 03-06-2020

Authorizing Documents: D1910055

Disposition:	Accepted
Effective Date:	03-29-2020

Resolution Required: No

Resolution Number: None

Commission Meeting Date: None

CPUC Contact Information:

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PUBLIC UTILITIES COMMISSION
505 Van Ness Avenue
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To: Energy Company Filing Advice Letter

From: Energy Division PAL Coordinator

Subject: Your Advice Letter Filing

The Energy Division of the California Public Utilities Commission has processed your recent Advice Letter (AL) filing and is returning an AL status certificate for your records.

The AL status certificate indicates:

- Advice Letter Number
- Name of Filer
- CPUC Corporate ID number of Filer
- Subject of Filing
- Date Filed
- Disposition of Filing (Accepted, Rejected, Withdrawn, etc.)
- Effective Date of Filing
- Other Miscellaneous Information (e.g., Resolution, if applicable, etc.)

The Energy Division has made no changes to your copy of the Advice Letter Filing; please review your Advice Letter Filing with the information contained in the AL status certificate, and update your Advice Letter and tariff records accordingly.

All inquiries to the California Public Utilities Commission on the status of your Advice Letter Filing will be answered by Energy Division staff based on the information contained in the Energy Division's PAL database from which the AL status certificate is generated. If you have any questions on this matter please contact the:

Energy Division's Tariff Unit by e-mail to
edtariffunit@cpuc.ca.gov

February 28, 2020

Advice 5772-E

(Pacific Gas and Electric Company ID U 39 E)

Public Utilities Commission of the State of California

Subject: Defining Grace Periods, Overage Fees and Data Use in Pacific Gas and Electric Company's Commercial Electric Vehicle Rate

Purpose

Pursuant to Ordering Paragraph (OP) 8 of Decision (D.) 19-10-055, Pacific Gas and Electric Company (PG&E) submits this advice letter to accomplish the three following goals related to features of the Commercial EV (CEV) rate: (1) define what constitutes a qualifying event for a grace period; (2) outline the CEV overage fee structure and plan for collecting overage data; (3) provide a timeline for evaluating the overage system for any needed modifications.

Additionally, PG&E intends to file a separate Advice Letter in early March 2020 containing the tariff sheets describing the grace period, overages, and other components of the CEV rate.

Background

On November 5, 2018, PG&E filed Application (A.) 18-11-003 seeking approval of its new commercial rates for load serving electric vehicle service equipment (EVSE) and the creation of a new class of customers choosing to take service on the rate. Decision 19-10-055 (Decision) approved PG&E's application on October 24, 2019. On December 24, 2019 the California Public Utilities Commission (CPUC) approved a plan by PG&E to implement CEV rate in two phases¹. Phase 1 is scheduled to be available to customers by May 1, 2020 and includes the fundamental components of a rate including rate enrollment via PG&E call centers and standard billing. Phase 2 will be deployed October 1, 2020 and includes a wider array of features and functionality such as online rate enrollment, solar (Net Energy Metering) billing, implementation of overage fee grace periods, subscription overage fees, as well as overage fee notifications by SMS/email.

¹ PG&E's request for extension of time to comply with D.19-10-055 was granted by the Executive Director of the California Public Utilities Commission in a letter dated December 24, 2019.

All customers on the CEV rate will have an extended grace period from the Phase 1 deployment on May 1, 2020 through the end of the 2020 calendar year. In addition, an online tool will be made available for current and prospective customers which provides cost estimates based on kWh and kW usage and other EV related factor.

Program Overview

1. Defining a Grace Period and Qualifying Events

A grace period as defined by D. 19-10-055, is a period of three (3) billing cycles in which a CEV customer is not subject to overage fees associated with exceeding the customer's monthly pre-defined kW demand subscription. A grace period is triggered under either or both of the following two conditions: (1) a CEV customer first enrolls in a CEV rate, and/or (2) the CEV customer adds additional charging infrastructure that increases the customer's load. These events are described in more detail below.

1. **Customer Enrollment:** A grace period is triggered when a customer enrolls in a CEV rate.
 - i. A PG&E customer is eligible for a grace period when they enroll into a CEV rate.
 - ii. A customer who changes from one type of the CEV rate to another CEV rate is eligible for a grace period upon enrollment in the new rate. For example, a customer that has been enrolled in the CEV Small ($\leq 100\text{KW}$) version of the rate changes to the CEV Large ($\geq 100\text{KW}$) - or vice versa - is eligible for a grace period.²
2. **Addition of EVSE:** A second qualifying event for grace periods is if an existing customer enrolled on the CEV rate (Small or Large) adds load supporting Electrical Vehicle Service Equipment (EVSE) and informs PG&E of the change.
 - i. The main contributor to incremental increase in a customer's load is due to the addition of electrical vehicle chargers.

2. Verifying Customer Proof of Eligibility

CEV Rate Enrollment: Upon customer engagement to establish new energy service, PG&E will set up all new commercial EV sites on meters solely dedicated to EV charging infrastructure. This set up is similar to how PG&E is currently and has previously set up metering for our existing large commercial EV accounts. If a customer is a current PG&E customer but new to the CEV rate, PG&E will request customers to self-certify that their meter's end use is 100% dedicated to EV charging. If a customer does not meet this CEV

² In the case of rate changes, PG&E will maintain the existing standard practice of allowing one (1) customer rate change in a 12-month period per Rule 12 (Rates & Optional Rates) Section C.

rate eligibility requirement, PG&E will assist the customer in scheduling a new EV meter installation at the site.

For new commercial customers who have completed an EV meter installation and have elected the CEV rate, and for existing customers who self-certified their meter's end use upon CEV rate enrollment, an individually metered EV characteristic will be stored on the customers service point record for future rate eligibility reference.

Overage Fee Grace Period: The overage fee grace period spans three billing cycles and is triggered by enrollment onto a CEV rate. Customers already enrolled on the CEV rate must notify PG&E if they increase the amount of installed EV charging infrastructure behind the meter, this event will trigger an additional grace period.

3. Collection of Customer Overage Data

Overview of CEV Subscription: The subscription component of the CEV is a unique rate feature and is interconnected with the overage component subsequently described in the Advice Letter. The CEV rate does not include demand or customer charges and instead uses a monthly subscription for customer's kW demand. The subscription comes in blocks of 10kW for the Small CEV rate and in 50kW blocks for the Large CEV rate. A customer determines their estimated maximum kW and then selects a subscription rate and number of units to suit their kW demand.

CEV Small-Low Use	CEV Large-High Use
<ul style="list-style-type: none">Charging installations equal to 100 kW or less**, e.g. smaller workplaces and multifamily sites	<ul style="list-style-type: none">Charging installations equal to 100 kW and over**, e.g. fleets, fast charging, and larger sitesOptions for secondary and primary voltage service

**A customer can select 100kW on both Small and Large rates

Overview of Overage Structure: An overage is incurred when a customer surpasses the kW allotment of their pre-determined subscription level. Note that the customer's subscription level is determined by the customer and can be increased or decreased as the customer sees fit. Overage will be measured on a rolling 15-minute interval based on the kW usage within each 15-minute interval. For example, a customer with a 50kW subscription whose demand exceeds 50kW in a given 15-minute interval of the billing cycle is considered to have incurred an overage. Subscription changes are in effect as soon as a customer completes a request to change subscription levels rather than only taking effect at the beginning of the next billing cycle.

Example of Subscription Overage: Customer "A" selects 60kW subscription, which falls into the "CEV Small" subscription bracket. During a billing cycle the customer's demand

usage is 61kW, which is 1kW in excess of the 60kW subscription. Therefore, the customer has incurred a 1kW overage fee.

If a customer exceeds their subscription after the grace period, PG&E will bill them their monthly subscription charge and for kW overages exceeding the customers subscribed amount. Overage kW will be charged in increments of 1kW and charged at twice the rate of subscription kW costs for exceeding the subscription level. For example, if the subscription fee were \$12.42 per 10kW (ie, \$1.24 per 1kW), the overage fee would be \$2.48 per 1kW.³ A customer that has a 60kW subscription but uses 61kW will pay for the 60kW subscription (\$74.52) plus the additional 1kW at double price (\$2.48).

Although a customer may exceed their kW subscription level multiple times per billing cycle, a customer can only incur one (1) financial penalty associated with overage for each billing cycle. The single overage fee a customer may incur per billing cycle is based on the highest kW demand in a given billing cycle. For example, if a customer with a 60kW subscription uses 61kW of demand in a 15-minute window followed by a 65kW of demand in another 15-minute window, the customer incurs an overage fee only for the 5kW for that billing cycle.

A formula for the overage fee calculation is provided below.

Overage Fee Calculation

$$(\$ \text{ per subscription kW}) * 2 = \text{Overage fee per kW}$$

Note that a customer in a grace period is not charged a punitive fee for any kW overages within a given grace period.

Collecting Overage Data: A customer's overage fee is derived from 15-minute interval data using the methodology described above. Once the highest kW utilization in a billing cycle is identified, if it is over the subscription amount, then the overage fee calculation is performed and included in the billing cycle's final bill. While the highest overage is the only overage which incurs a punitive fee, every instance of overage is identified and tagged internally by PG&E as a unique data point that is a binary "yes" or "no" depending if an overage occurred in each 15-minute interval. The rationale for tracking each instance of a kW overage is to better understand how customers utilize their subscribed load and how charging behavior differs between grace period and non-grace period charging as well as charging behavior at various TOU periods throughout the day.

³ The subscription values used here are illustrative and will be updated when rate values are finalized prior to the rate being open on May 1, 2020. The CEV-Small rate value (pending finalization) included in this example is drawn from the rate values as described in the Decision (\$12.41 per 10kW).

Reporting Overage Data: Pursuant to Ordering Paragraph 5, 6, 8, and 15 in Decision (D.) 19-10-055, PG&E is preparing to collect and report data associated with customer overages and grace periods. This data will be used to understand the economic and behavioral impact of overage fees to customers as well as the impact to the electrical grid serviced within PG&E's infrastructure territory.

This data and associated analysis will be included in the overall analysis provided during the CEV rate data workshop to be convened no later than March 1, 2021, as directed in Ordering Paragraph 15 of the Decision.

Currently PG&E is planning to collect and report on the following metrics related to kW overage. During subsequent evaluations of the overage system PG&E may alter the report depending on customer and compliance needs.

Data points for overage reporting:

1. All instances of customer overages by billing cycle.
2. Aggregated customer overages Dollar amount and kW amount by billing cycle.
3. Individual customer overages Dollar amount and kW amount by billing cycle.

4. Timeline and Execution of Overage System Evaluation

As described in the Background to this Advice Letter, the CEV rate will be deployed in two stages: May 1, 2020 for the basic rate and October 1, 2020 for the full rate. Per the extension request Letter to the Executive Director submitted by PG&E and approved by the CPUC on December 24, 2019, the overage system and reporting functionality will be fully operational no later than October 1, 2020.

Starting October 1, 2020 when the full CEV rate goes into effect, all customers enrolled in the CEV rate will be re-enrolled in the CEV rate with full functionality. In order to provide customers with a smooth transition to the new rate, this re-enrollment will provide all customers enrolled on the CEV rate with an additional grace period for the remainder of the 2020 calendar year. This "global" grace period is applied to all customers and is in addition to the grace period applied to all CEV customers beginning May 1, 2020. Therefore, overage fees will not be applied to any CEV customers until January 1st, 2021 regardless of kW usage or overages. Because the "global" grace period is designed to be a trial period where customers incur no additional fees for kW overages, PG&E views this additional grace period through the end of 2020 as benefitting customers.

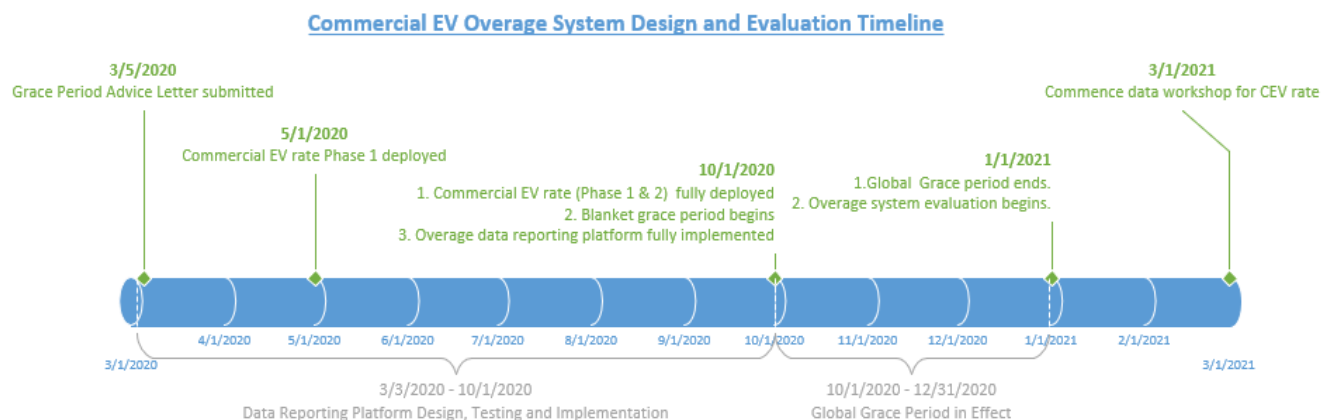
The evaluation timeline of the overage system is predicated upon two major milestones: 1) the full deployment of the Commercial EV rate by October 1, 2020, and 2) customers begin to use the rate outside of the blanket grace period which extends through the end of 2020. Customer charging on a fully-operationalized CEV rate will begin on January 1st, 2021 after the grace period for all customers. Therefore, it is a timely and reasonable measure to begin evaluation of the overage system and the efficacy of its punitive fees beginning January 2021 once the grace period applied to all customers has concluded.

Subsequently, PG&E will perform an evaluation of the grace period and overage features, and take appropriate action based on the evaluation's findings.

A similar evaluation of the overage system will be performed every subsequent calendar year. PG&E will perform any needed modifications to the overage system based on this yearly analysis in order to better serve customers, optimize grid utilization, and streamline commercial EV services.

Additionally, PG&E will assemble all reports and findings related to the overage system to share during the informal data workshop to be held on or before March 1, 2021 although it is likely that there will be 1-2 months of data available at the most. Due to the timeline of implementation including the "global" grace period through the end of 2020, the possibility should be considered that little or no overage data will be available by March 1, 2021

Below is a graphic timeline detailing the above milestones.



Effective Date

PG&E requests that this Tier 2 advice submittal become effective on regular notice, March 29, 2020 which is 30 calendar days after the date of submittal.

Protests

Anyone wishing to protest this filing may do so by letter sent via U.S. mail, facsimile or E-mail, no later than March 19, 2020 which is 20 days after the date of this submittal. Protests must be submitted to:

CPUC Energy Division
ED Tariff Unit
505 Van Ness Avenue, 4th Floor
San Francisco, California 94102

Facsimile: (415) 703-2200
E-mail: EDTariffUnit@cpuc.ca.gov

Copies of protests also should be mailed to the attention of the Director, Energy Division, Room 4004, at the address shown above.

The protest shall also be sent to PG&E either via E-mail or U.S. mail (and by facsimile, if possible) at the address shown below on the same date it is mailed or delivered to the Commission:

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

Any person (including individuals, groups, or organizations) may protest or respond to an advice letter (General Order 96-B, Section 7.4). The protest shall contain the following information: specification of the advice letter protested; grounds for the protest; supporting factual information or legal argument; name, telephone number, postal address, and (where appropriate) e-mail address of the protestant; and statement that the protest was sent to the utility no later than the day on which the protest was submitted to the reviewing Industry Division (General Order 96-B, Section 3.11).

Notice

In accordance with General Order 96-B, Section IV, a copy of this advice letter is being sent electronically and via U.S. mail to parties shown on the attached list and the parties on the service list for A.18-11-003. Address changes to the General Order 96-B service list should be directed to PG&E at email address PGETariffs@pge.com. For changes to any other service list, please contact the Commission's Process Office at (415) 703-2021 or at Process_Office@cpuc.ca.gov. Send all electronic approvals to PGETariffs@pge.com. Advice letter filings can also be accessed electronically at: <http://www.pge.com/tariffs/>.

/S/

Erik Jacobson
Director, Regulatory Relations

cc: Service List A.18-11-003



ADVICE LETTER SUMMARY

ENERGY UTILITY



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

Company name/CPUC Utility No.: Pacific Gas and Electric Company (ID U39E)

Utility type:

☒ ELC ☐ GAS ☐ WATER
☐ PLC ☐ HEAT

Contact Person: Kimberly Loo

Phone #: (415)973-4587

E-mail: PGETariffs@pge.com

E-mail Disposition Notice to: KELM@pge.com

EXPLANATION OF UTILITY TYPE

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

(Date Submitted / Received Stamp by CPUC)

Advice Letter (AL) #: 5772-E

Tier Designation: 2

Subject of AL: Defining Grace Periods, Overage Fees and Data Use in Pacific Gas and Electric Company's Commercial Electric Vehicle Rate

Keywords (choose from CPUC listing): Compliance

AL Type: ☐ Monthly ☐ Quarterly ☐ Annual ☒ One-Time ☐ Other:

If AL submitted in compliance with a Commission order, indicate relevant Decision/Resolution #: D.19-10-055

Does AL replace a withdrawn or rejected AL? If so, identify the prior AL: No

Summarize differences between the AL and the prior withdrawn or rejected AL:

Confidential treatment requested? ☐ Yes ☒ No

If yes, specification of confidential information:

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: 3/29/20

No. of tariff sheets: 0

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: Erik Jacobson, c/o Megan Lawson
Title: Director, Regulatory Relations
Utility Name: Pacific Gas and Electric Company
Address: 77 Beale Street, Mail Code B13U
City: San Francisco, CA 94177
State: California Zip: 94177
Telephone (xxx) xxx-xxxx: (415)973-2093
Facsimile (xxx) xxx-xxxx: (415)973-3582
Email: PGETariffs@pge.com

Name:
Title:
Utility Name:
Address:
City:
State: District of Columbia Zip:
Telephone (xxx) xxx-xxxx:
Facsimile (xxx) xxx-xxxx:
Email:

Clear Form

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