

PUBLIC UTILITIES COMMISSION

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May 8, 2023

Sidney Bob Dietz II
Director, Regulatory Relations
Pacific Gas and Electric Company
77 Beale St., Mail Code B13U
P.O. Box 770000
San Francisco, CA 94177

Subject: Pacific Gas and Electric Company's Advice Letter 6506-E to D.21-11-017 Day Ahead Hourly Real Time Pricing Business Electric Vehicle Rebate Program Proposal

Dear Mr. Dietz:

Pacific Gas and Electric Company's (PG&E) Advice Letter (AL) 6506-E, which provides information regarding its proposal for a Day Ahead Hourly Real Time Pricing (DAHRTP) Business Electric Vehicle (BEV) Rate Rebate Program (Rebate Program) pursuant to Decision 21-11-017, is approved as filed, effective March 19, 2022.

The appendix of this letter provides a summary of AL 6506-E, the protest of Electrify America, PG&E's response to Electrify America's protest, as well as Energy Division's disposition of the issues.

Please contact Achintya Madduri at achintya.madduri@cpuc.ca.gov or (415) 696-7350 if you have any questions.

Sincerely,

Handwritten signature of Leuwam Tesfai in black ink, followed by the word "FOR" in blue capital letters.

Leuwam Tesfai
Deputy Executive Director for Energy and Climate Policy/
Director, Energy Division
California Public Utilities Commission

cc: ED Tariff Unit
Achintya Madduri (ED)
Paul Phillips (ED)
Daniel Buch (ED)
Davison Van Cleve (Attorney for Electrify America, LLC)

Appendix: Energy Division Technical Review and Analysis

Background:

In 2019, the California Public Utilities Commission (CPUC) authorized Pacific Gas and Electric Company (PG&E) to create a new business electric vehicle (BEV) rate class and implement a rate for its BEV class that has more time-differentiated charges than PG&E's typical TOU rates, and a subscription demand charge specifically designed for commercial customers that are deploying EVs or owning and/or operating EV charging infrastructure. The new rate, adopted in Decision (D.) 19-10-055, was intended to support transportation electrification by offering commercial customers more predictable monthly bills that have a relatively fixed monthly surcharge based on a site's EV charging load.

On October 23, 2020, PG&E filed an application for approval of a dynamic rate option for commercial electric vehicle customers in response to Ordering Paragraph (OP) 9 of D.19-10-055. In November 2021, the CPUC issued D.21-11-017 (Decision) that required PG&E to offer an optional Day Ahead Hourly Real Time Pricing (DAHRTP) rate to customers that have enrolled, or are eligible to enroll, in its existing BEV Rate.

In OP 4, the Decision authorized PG&E to recover up to \$1.295 million to fund one-time rebates for technological upgrades necessary to enable customers' existing charging infrastructure to automatically respond to the DAHRTP BEV rate. The Decision acknowledged that the incentives could be paid to either customers that own and operate their own charging stations and software or third-parties that provide charging equipment and technology.¹ The Decision directed PG&E to file a Tier 2 advice letter describing its rebate program for technological upgrades necessary for customers that have existing EV charging infrastructure to ensure they can receive the automated pricing signals associated with its optional, day-ahead, real-time BEV rate.² The instant advice letter (AL) 6506-E described PG&E's Rebate Program to distribute these one-time rebates.

PG&E, as required by the Decision, filed AL 6506-E on February 17, 2022, and included the following details regarding its rebate program:

1. **Rebate Program Overview.** PG&E stated that this Rebate Program supports adoption of the DAHRTP BEV rate by helping customers overcome the barrier associated with the cost of technological upgrades required such that their existing charging infrastructure can receive and respond to DAHRTP BEV rate price signals. PG&E stated that in designing the rebate program it pursued the following objectives:
 - The rebate structure should encourage a wide range of Electric Vehicle Service Providers (EVSP) to build the technical capability for their customers to take service on and manage their charging using the DAHRTP BEV rate.
 - The Rebate Program should be straightforward, and it should be easy for customers to understand their eligibility
 - The Rebate Program and associated ME&O should encourage a variety of different types of customers eligible for BEV rate to take service on the DAHRTP BEV rate.

¹ D.21-11-017 at 20.

² *Id.*

- The rebate should be designed to quickly enable a wide swath of customers to have automated access to the DAHRTP BEV rate, while driving towards market self-sufficiency after the program funds are exhausted.
2. **PG&E Communication of Rate Information and Need for Technology Integration.** PG&E stated that since technology and automation can simplify the DAHRTP BEV rate access for customers, a key enabler for DAHRTP BEV rate participation is technology that provides customers with the ability to automatically conduct price discovery. Therefore, to enable some customers to automatically manage their EV charging to match DAHRTP BEV rate price signals, EVSPs would need to upgrade their EVSE and customer-facing applications to enable automated integrations of DAHRTP BEV Rate information and pricing signals to interested stakeholders, including EV drivers who use the DAHRTP BEV rate customer's charging station. PG&E's rebate program was designed to support DAHRTP BEV rate adoption and provide a wide range of BEV customers with the opportunity to take service on the DAHRTP BEV rate.³
 3. **Eligibility:** PG&E provided details on the types of PG&E customers and EVSPs that are eligible for the rebate program.⁴
 4. **Requirements:** PG&E stated that the DAHRTP BEV Rebate would be available for EVSP Owners and EVSP Suppliers who make the necessary technology updates to their existing charging infrastructure to automatically respond to the DAHRTP BEV rate. PG&E also included specific requirements.⁵
 - EVSPs will be required to implement a mechanism to automatically pull daily prices using one of the Communication Channels and display pricing signal on any interfaces or existing software the EVSP Owner offer to their customers or any interfaces or existing software the EVSP Supplier offer to PG&E BEV Account Holders, such as an EVSE interface, mobile device apps or web interfaces for the end customer and scheduling management software.
 - EVSEs must be networked and enable managed charging.
 - PG&E Account Holders Rebate participants will be required to stay on DAHRTP BEV rate for a year.
 - EVSPs and PG&E BEV Account Holders who receive a rebate as part of this Rebate Program will be required to pass on the price signal to their customers once the DAHRTP BEV rate is adopted. A Load Management Plan will be required if the EVSP Owners or PG&E BEV Account Holders opt out from passing through the price signal. If the EVSP Owners or PG&E BEV Account holders opt out from passing through the price signal, they will be required to report on the alternative pricing signal approach they use. The final details of the reporting requirements will be detailed in the DAHRTP BEV Rate Evaluation Plan to be submitted in 2022.
 - All Rebate Program participants (EVSPs and PG&E BEV Account Holders) will be required to participate in data collection activities and provide ongoing reports on Rebate Program success metrics.
 - Any rebate recipients who are installing new EV infrastructure are required to follow the safety protocols that are required of any PG&E customer requesting a new

³ PG&E AL 6506-E at 4.

⁴ *Id.*

⁵ *Id.* at 5.

business contract or if participating in a PG&E TE program, will be required to follow safety protocols mandated by that program.

5. **Verification:** PG&E stated that a robust verification process will be tailored to each participating EVSP and may consist of reports showing completed API integration tests, screenshots of the pricing signals enabled at the end-customer user interface (e.g., PG&E BEV Account Holder EV charging stations, mobile apps, website), or other verification tools.
6. **Budget:** PG&E stated that the Decision authorized PG&E to recover up to \$1.295 million for the Rebate Program to cover technological upgrades necessary to enable customers' existing charging infrastructure to automatically respond to the DAHRTP BEV rate. This budget will be fully dedicated to cover rebate costs.⁶
7. **Rebate Levels:** PG&E specified the rebate levels for the various entities that are eligible for the rebate program and stated its assumptions in the design of the rebate levels.⁷ PG&E stated that it sized the rebate amounts based on implementation cost estimate obtained through market research and leveraging an internal IT knowledge base. PG&E designed the rebates to cover a portion of estimated implementation costs and varied the amount of costs the rebates cover between EVSP Suppliers and EVSP Owners, for several reasons that it outlined in the AL. In addition to specifying rebate levels for EVSP Owners, and EVSP Suppliers and PG&E BEV Account Holders, PG&E also specified that for PG&E BEV Account Holders who might adopt the rate without automation, a rebate will be available in exchange for data collection.
8. **Application Process:** PG&E specified the process by which EVSPs and PG&E customers will be able to apply for the rebate program and stated that the rebates will be available on a first come first served basis.⁸
9. **Marketing, Education & Outreach (ME&O):** PG&E described its strategy for ME&O for the rebate program, including partnering with EVSPs on ME&O and providing educational materials for site hosts on how to educate their customers on the benefits of the DARTP BEV rate.⁹
10. **Timeline:** PG&E specified the timeline, including that the rebate program will commence with the launch of the DAHRTP BEV rate, targeted for Q4 2023, with anticipated duration of up to 24 months to afford sufficient time for customer outreach, technology development, verification, and data collection.¹⁰
11. **Evaluation and Reporting:** PG&E stated that per the Decision, PG&E is required to develop an evaluation strategy of the rate and file annual reports following the implementation of the DAHRTP BEV rate for the first three years of the optional rate's availability. Therefore, participating EVSPs will be required to provide ongoing data

⁶ *Id.* at 6.

⁷ *Id.* at 6-9.

⁸ *Id.* at 9.

⁹ *Id.* at 9-10.

¹⁰ *Id.* at 10.

reporting on a relevant metrics (e.g., number of participating sites, pass-through pricing information). Metrics relevant to the rebate program will be incorporated in the evaluation.¹¹

12. **Additional Consideration:** PG&E stated additional factors regarding the rebate program, and stated that due to those factors, the rebate program participation may be impacted and the rebate program approach might need to be adjusted based on the learnings after the launch.¹²

Electrify America Protest

On March 9, 2022, Electrify America, LLC (Electrify America) submitted a protest to PG&E AL 6506-E on the grounds that PG&E has added significant restrictions and requirement to the rebate proposal which were not approved in the Decision and to which Electrify America would have raised objections had such conditions been present during the proceeding.¹³ Electrify America presented the following arguments in its protest:

1. **The Decision provided limited guidance on the incentives and did not support PG&E’s requirement for rebate program participation.** Electrify America argued that the Decision provided very limited guidance regarding the rebate program other than rejecting PG&E’s proposal for incentives to drivers. Electrify America stated that PG&E is layering on the requirement that the dynamic rate must be displayed to eventual customers that an EVSP such as those that Electrify America serves, and is limiting the ability for EVSPs to respond in innovative fashions to the rate that the Decision allowed, such as by leveraging energy storage to provide elasticity to the volumetric signal or use social media or rewards programs at its discretion. According to Electrify America, the Advice Letter as written precludes rebate availability for these innovative approaches even though they qualify per the Decision in terms of requiring technological upgrades to receive and respond to automated pricing signals. Electrify America also stated that PG&E’s requirements that rebate program participants either: (1) pass on the price signal to their customers once the DAHRTP BEV rate is adopted; or (2) adopt a load management plan, impose additional obligations not contemplated by the Decision.¹⁴

Electrify America further highlighted PG&E’s requirement that rebate recipients “participate in data collection activities and provide ongoing reports.” It argued that the Decision did not authorize any data reporting obligations for rebate program participants, and that such an obligation may conflict with other reporting requirements and timelines rebate recipients face, increase soft costs associated with providing EV charging, and raise additional customer privacy and commercially sensitive data concerns that may inhibit legal clearance for any participation in the program for most entities.¹⁵

Electrify America also objected to PG&E’s proposed plan to provide a rebate per site for those participants that may adopt the rate without automation on the grounds that the proposal is in conflict with the Decision, which requires the rebate program to be limited to

¹¹ *Id.* at 10.

¹² *Id.* at 11.

¹³ Electrify America Protest at 1.

¹⁴ *Id.* at 2.

¹⁵ *Id.* at 3.

“technological upgrades” and not extend to providing an incentive for data collection when such upgrades have not been performed.¹⁶

Lastly, Electrify America argued that PG&E’s proposal to differentiate rebate levels between EVSP suppliers and EVSP owners is discriminatory and that there is no justification for PG&E to limit rebates to “~50% of costs for EVSP Suppliers and ~20% of costs for EVSP Owners.” Many EVSP Owners may have sites without energy storage, while EVSP Suppliers may have sites with energy storage that would then qualify for the higher rebate. Electrify America argued that any discrimination among EVSP Owners and Suppliers with or without energy storage is unwarranted and not authorized by D.21-11-017.¹⁷

2. **Requested Relief.** Electrify America requested that Energy Division reject the Advice Letter as filed with instructions to PG&E to eliminate the qualifications that PG&E had included in the Advice Letter. It argued that the rebate program should not require: (1) the pass-through of rate signals, (2) updates to user interfaces, (3) the disclosure of commercially sensitive information, and (4) ongoing data collections and reports, and should not discriminate between EVSP providers or EVSP owners with or without energy storage.

PG&E’s Reply to the Protest from Electrify America

On March 16, 2022, PG&E submitted a reply to the protest from Electrify America as follows:

1. **Electrify America’s Request That the Incentive Program Should Not Require the Display of DAHRTP Rate Signals.** PG&E stated that its requirements for rebate program participants and verification processes were designed to ensure that the rebate funds achieve the purpose for what they are intended, i.e., to “cover technological upgrades necessary to enable customers’ existing charging infrastructure to automatically respond to the DAHRTP BEV rate.”¹⁸ PG&E further clarified that the requirement to display a pricing signal does not mean that EVSP have to display the BEV rate signal, and therefore does not limit EVSPs from innovating on how the signal is presented, or how the BEV customer sets its own custom price to its customers for its EV charging service.¹⁹
2. **Electrify America’s Request That the Incentive Program Should Not Require the Load Management Plan for Customers of Record Who Decline to Display the BEV Pricing Signal.** PG&E stated that its rebate program proposal offers an alternative requirement in the form of a load management plan, to report on any alternative pricing signal approaches the customer of record may use. PG&E stated that its proposal was aligned with direction from the CPUC in other programs, that a load management plan will ensure that the rebate participant will have strategies in place to respond to pricing signals if they are not planning to pass these pricing signals on to their customers. PG&E stated that the requirement for load management plans and data will support learning about the impacts and benefits from a DAHRTP rate that will be available to BEV customers.²⁰

¹⁶ *Id.*

¹⁷ *Id.*

¹⁸ D. 21-11-017 at 19.

¹⁹ PG&E Reply to Electrify America Protest at 1-2.

²⁰ *Id.* at 3.

3. **Electrify America’s Request That the Incentive Program Should Not Require the Disclosure of Commercially Sensitive Information and Not Require Ongoing Data Collections and Reports.** PG&E argued that utility-funded transportation electrification programs commonly set special data collection requirements from vendors or customers of record to obtain data to measure the effectiveness of their ratepayer-funded programs. It stated that in order to receive a ratepayer funded rebate through the rebate program, the Customer of Record must consent to the use of their data for Evaluation, Measurement & Verification (EM&V). PG&E argued that data collection is a common practice, and that the Decision authorized a budget to cover a range of measurement and verification activities associated with the Pilot. PG&E also highlighted its March 24, 2022, EM&V workshop regarding its evaluation metrics and data reporting requirements, which gave stakeholders and the public an opportunity to provide feedback on its proposal.²¹
4. **Electrify America’s Concern That the Incentive Program Offered to Customers of Record Who Adopt the Rate Without Automation Conflicts with the Decision.** PG&E stated that its reason for proposing a rebate to customers who adopt the DAHRTP BEV rate without automation is to gather data on customer’s motivation to adopt a potentially highly volatile rate without automation. It hypothesized that there will be a very limited number of such customers, posing minimal risk and low impact to the overall budget, with a potential for learnings to inform future rate design.
5. **Electrify America’s Request That the Rebate Program Should Not Distinguish Between EVSP Suppliers and EVSP Owners with or without Energy Storage.** PG&E disagreed with Electrify America’s claim that PG&E’s proposal was discriminatory in varying the level of rebate that will be available, distinguishing between EVSP suppliers and EVSP owners. PG&E argued that its proposal is aligned with standard practice in rebate program design by taking into consideration which customers are less likely to adopt the technology based on the perceived barriers and to size the rebates to address these barriers and points to its justification in AL 6506-E. PG&E highlighted its determination that EVSP Owners with onsite battery storage already are likely to have an economic incentive to enroll in DAHRTP BEV rate to manage bills; in contrast, EVSP Owners without battery storage who are passing rates directly through to their customers may find it harder to make the business case to invest in dynamic rates due to pricing volatility and lack of charging elasticity.²²

²¹ *Id.* at 4.

²² *Id.* at 5.

Discussion:

Energy Division has reviewed AL 6506-E and finds that it is compliant with the requirements of the Decision and provides the necessary details describing PG&E's rebate program to cover technological upgrades necessary for customers that have existing EV charging infrastructure to ensure they can receive the automated pricing signals associated with its optional, day-ahead, real-time BEV rate.

Energy Division finds that Electrify America's protest does not provide a basis for rejecting PG&E's ALs 6506-E under General Order (GO) 96-B, General Rule (Rule) 7.4.2. More specifically, GO 96-B, Rule 7.4.2 provides that a protest to an AL may rest on the following grounds:

- (1) The utility did not properly serve or give notice of the advice letter;
- (2) the relief requested would violate, or is not authorized by, statute or Commission order;
- (3) the analysis, calculations, or data in the advice letter contain material errors or omissions;
- (4) the relief requested is pending before the Commission in a formal proceeding;
- (5) the relief requested is inappropriate for the advice letter process; and/or
- (6) the relief requested is unjust, unreasonable, or discriminatory.

Electrify America has not identified any "material errors or omissions" in the AL that would warrant its rejection, nor did it sustain any contention that the AL fails to comply with the Decision. Energy Division finds that PG&E has shown that its rebate program design is not "unjust, unreasonable, or discriminatory."²³ As such, Energy Division rejects Electrify America's protest pursuant to Rule 7.6.1 of Commission GO 96-B.

Disposition

In accordance with the discussion above, Energy Division hereby approves Advice Letter 6506-E, submitted by Pacific Gas & Electric Company.

²³ *Id.*

February 17, 2022

Advice Letter 6506-E

(Pacific Gas and Electric Company ID U 39 E)

Public Utilities Commission of the State of California

Subject: Day Ahead Hourly Real Time Pricing Business Electric Vehicle Rebate Program Proposal

Purpose

Pursuant to Ordering Paragraph 2 of Decision 21-11-017¹, Pacific Gas and Electric Company (PG&E) hereby submits its proposal for a Day Ahead Hourly Real Time Pricing (DAHRTP) Business Electric Vehicle (BEV) Rate² Rebate Program (Rebate Program) to cover technological upgrades necessary for customers that have existing EV charging infrastructure to ensure they can receive the automated pricing signals associated with its optional, day-ahead, real-time BEV rate.

This proposal will cover:

- (1) Rebate Program Overview
- (2) PG&E Communication of Rate Information and Need for Technology Integration
- (3) Rebate Program Details: Customer Eligibility, Requirements, Rebate Levels, Application and Verification Processes
- (4) Marketing, Education and Outreach (ME&O) Approach
- (5) Evaluation and Reporting

Background

In November of 2021, California Public Utilities Commission (CPUC) issued a Decision 21-11-017 (Decision) that requires Pacific Gas and Electric Company (PG&E) to offer an optional day-ahead, hourly real-time rate to customers that have enrolled, or are eligible to enroll, in its existing Business Electric Vehicle (BEV) Rate. The Decision authorizes

¹ California Public Utility Commission. (2021). Decision 21-11-017: DECISION AUTHORIZING PACIFIC GAS AND ELECTRIC COMPANY TO IMPLEMENT AN OPTIONAL DAY-AHEAD REAL TIME RATE FOR COMMERCIAL ELECTRIC VEHICLE CUSTOMERS

<https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M424/K557/424557371.PDF>

² Decision 19-10-055 issued on October 28, 2019 approved the application of PG&E's Commercial Electric Vehicle (CEV) rates, which were later rebranded as BEV rates.

PG&E to recover up to \$1.295 million in one-time rebates to cover technological upgrades necessary to enable customers' existing charging infrastructure to automatically respond to the DAHRTP BEV rate. This advice letter (AL) describes PG&E's Rebate Program to distribute these one-time rebates.

Rebate Program Overview

PG&E's DAHRTP BEV rate development supports California's widespread transportation electrification (TE) efforts to transition from conventional fuels to cleaner energy and enable customers to assist in grid management, save on fuel costs by aligning EV charging with periods of reduced energy costs, which also tend to be periods with high levels of generation from renewables and other non-greenhouse gas (GHG) emitting resources. Specifically, this Rebate Program supports adoption of the DAHRTP BEV rate by helping customers overcome the barrier associated with the cost of technological upgrades required such that their existing charging infrastructure can receive and respond to DAHRTP BEV rate price signals.

Potential customers for the DAHRTP BEV include, but are not limited to, the five use cases laid out in D.19-10-055³: public Direct Current Fast Charging (DCFC), workplace charging, multi-family dwellings (MFH), transit fleets and medium-duty (MD) delivery fleets. The DAHRTP BEV rate may be most beneficial for customers with unified resource alignment⁴ and significant duty cycle flexibility⁵: workplace, MFH, and MD delivery operators with large fleets of vehicles that have longer charging windows. Fragmented customers such as public DCFC with on-site battery storage and software enabled charging schedules, may also find the DAHRTP BEV rate beneficial. PG&E's goal is to enable as many customers as possible to have the option to take service on this innovative rate. In designing the Rebate Program, PG&E pursued the following program objectives:

- The rebate structure should encourage a wide range of Electric Vehicle Service Providers (EVSP) to build the technical capability for their customers to take service on and manage their charging using the DAHRTP BEV rate
- The Rebate Program should be straightforward, and it should be easy for customers to understand their eligibility
- The Rebate Program and associated ME&O should encourage a variety of different types of customers eligible for BEV rate to take service on the DAHRTP BEV rate

³ D.19-10-055, pp. 12

⁴ Per CPUC VGI Working Group, unified resource alignment refers to the case where the BEV customer and the EVSE are controlled and/or operated by the same actor. Fragmented resource alignment refers to the case where the BEV customer and the EVSE are controlled by different actors. Report: VGI working Group, Final Report of the California Joint Agencies VGI Working Group (June 30, 2020), p. 19. Available at: <https://gridworks.org/wp-content/uploads/2020/07/VGI-Working-Group-Final-Report-6.30.20.pdf>.

⁵ The ability of a customer to shift its EV charging behavior based on the flexibility of its vehicle operations, or duty cycle, to charge during fluctuating low-cost hours.

- The rebate should be designed to quickly enable a wide swath of customers to have automated access to the DAHRTP BEV rate, while driving towards market self-sufficiency after the program funds are exhausted.

There are three main types of entities discussed in this AL. The first two types of entities are two different types of EVSPs who can receive incentives if they are taking the DAHRTP BEV rate option:

1. **EVSP Owner:** An EVSP which owns and operates their own sites who is also the PG&E Customer of Record.⁶ An example of an EVSP Owner is a Direct Current Fast Charging (DCFC) company that owns and operates DCFC charging plazas and is a PG&E Customer of Record.
2. **EVSP Supplier:** An EVSP which offers Electric Vehicle Supply Equipment (EVSE) installation and services to PG&E customers or “PG&E BEV Account Holders.” These EVSPs are not the PG&E Customer of Record, rather, the PG&E BEV Account Holder is the PG&E Customer of Record. An example of an EVSP Supplier is an EVSP that sells EVSEs to a workplace where the workplace owns and operates the EVSEs. The workplace is the PG&E Customer of Record and is considered the PG&E BEV Account Holder.

Finally, the third type of entity is not an EVSP, but is a non-residential customer who acts as a site host for EVSEs:

3. **PG&E BEV Account Holder:** Non-residential PG&E customer who has EV charging infrastructure installed on site and is the PG&E Customer of Record. This customer may or may not work with an EVSP Supplier who participates in the DAHRTP BEV Rebate Program.

PG&E Communication of Rate Information and Need for Technology Integration

PG&E DAHRTP BEV rate information will be digitally transmitted to customers using a PG&E customer enablement tool and will also be available on PGE.com as a static page and as flat file for download (in *.csv format) for general audiences (Communications Channels). PG&E will work with the California Energy Commission (CEC) to ensure alignment with the Market Informed Demand Automation Server (MIDAS) publicly accessible at <https://midasapi.energy.ca.gov>. PG&E will provide additional information, including access and instructions on how to receive the DAHRTP BEV rate, once the customer enablement tool is live, anticipated to be ready in Q4 2023.

Customers with unified resource alignment and significant duty cycle flexibility could theoretically adopt the DAHRTP BEV rate without full-on system integration and leverage other Communications Channels, such as the static PGE.com page with day ahead of pricing or access the flat file. However, technology and automation can simplify the

⁶ Customer of Record: PG&E customer and party who owns or lease the EVSEs and pays the PG&E bill.

DAHRTP BEV rate access for customers. Therefore, a key enabler for DAHRTP BEV rate participation is technology that provides customers with the ability to automatically conduct price discovery.

PG&E BEV Account Holders are likely to have EVSEs and EVs that are at different levels of technical maturity and may not have the technology available to automatically take advantage of the DAHRTP BEV rate. To enable some customers to automatically manage their EV charging to match DAHRTP BEV rate price signals, EVSPs will need to upgrade their EVSE and customer-facing applications to enable automated integrations of DAHRTP BEV Rate information and pricing signals to interested stakeholders, including EV drivers who use the DAHRTP BEV rate customer's charging station.

PG&E's Rebate Program is designed to support DAHRTP BEV rate adoption and provide a wide range of BEV customers with the opportunity to take service on the DAHRTP BEV rate.

Eligibility

PG&E BEV Account Holders eligible for the Rebate Program are the same PG&E customers who are also eligible for the BEV rate⁷:

- Non-Residential PG&E customers
- Have either new or existing EV infrastructure on a separate meter
- Bundled customers
- Unbundled customers served by Community Choice Aggregation (CCA) or direct access (DA) providers who are providing a DAHRTP BEV rate option for their customers.

EVSPs eligible for the Rebate Program are:

- EVSP Owners and EVSP Suppliers
- The EVSP Supplier must be an authorized distributor or reseller of the EVSE hardware and software
- Must be regularly and continuously engaged in the business
- Must have at least one site installed and operational in PG&E service territory prior to applying for the rebate.

⁷ BEV Tariff, p.1, Applicability.

https://www.pge.com/tariffs/assets/pdf/tariffbook/ELEC_SCHS_BEV.pdf

Requirements

The DAHRTP BEV Rebate is available for EVSP Owners and EVSP Suppliers who make the necessary technology updates to their existing charging infrastructure to automatically respond to the DAHRTP BEV rate. Specifically, EVSPs are required to implement a mechanism to automatically pull daily prices using one of the Communication Channels⁸ and display pricing signal on any interfaces or existing software the EVSP Owner offers to their customers or any interfaces or existing software the EVSP Supplier offers to PG&E BEV Account Holders, such as an EVSE interface, mobile device apps or web interfaces for the end customer and scheduling management software.

EVSEs must be networked and enable managed charging.

PG&E Account Holders Rebate participants will be required to stay on DAHRTP BEV rate for a year⁹.

EVSPs and PG&E BEV Account Holders who receive a rebate as part of this Rebate Program are required to pass on the price signal to their customers once the DAHRTP BEV rate is adopted. A Load Management Plan will be required if the EVSP Owners or PG&E BEV Account Holders opt out from passing through the price signal. If the EVSP Owners or PG&E BEV Account holders opt out from passing through the price signal, they will be required to report on the alternative pricing signal approach they use. The final details of the reporting requirements will be detailed in the DAHRTP BEV Rate Evaluation Plan to be submitted in 2022.

All Rebate Program participants (EVSPs and PG&E BEV Account Holders) are required to participate in data collection activities and provide ongoing reports on Rebate Program success metrics.

Any rebate recipients who are installing new EV infrastructure will be required to follow the safety protocols that are required of any PG&E customer requesting a new business contract¹⁰ or if participating in a PG&E TE programs, will be required to follow safety protocols mandated by that program.

Verification

PG&E will be able to confirm that PG&E BEV Account Holders have enrolled in the DAHRTP BEV rate once they request a rate change. However, rate enrollment does not

⁸ Implementation of the MIDAS API is the most reasonable communication channel, as the static page on PGE.com or flat file download are targeted to less technically savvy audience.

⁹ PG&E Customers may change their rate every 12 months. PG&E Tariff Rulebook, section C: CHANGING RATE SCHEDULES

https://www.pge.com/tariffs/assets/pdf/tariffbook/ELEC_RULES_12.pdf

¹⁰ See PG&E Customer Connections Portal: <https://www3.pge.com/ccoweb>

necessarily mean that the EVSP Owner or EVSP Supplier made the investment in the full-on system integration necessary for automatic charging in response to the DHARTP BEV Rate. A robust verification process will be tailored to each participating EVSP and may consist of reports showing completed API integration tests, screenshots of the pricing signals enabled at the end-customer user interface (e.g., PG&E BEV Account Holder EV charging stations, mobile apps, website), or other verification tools.

Budget

The Decision authorizes PG&E to recover up to \$1.295 million for the Rebate Program to cover technological upgrades necessary to enable customers' existing charging infrastructure to automatically respond to the DAHRTP BEV rate. This budget will be fully dedicated to cover rebate costs.

The Decision authorizes PG&E to recover up to \$443 thousand for ME&O activities, including the development and execution of targeted customer education efforts to inform eligible customers about the potential benefits of opting into real-time pricing for EV charging. ME&O activities associated with the Rebate Program will be covered by the ME&O authorized budget.

The Decision also authorizes an evaluation budget of between \$125 thousand to \$150 thousand to cover a range of measurement and verification activities including, but not limited to, framework design, customer research, and impact analysis. Rebate Program research questions will be included in the evaluation plan. Any evaluation costs associated with the Rebate Program will be included in the evaluation budget.

Rebate Levels

PG&E sized the rebate amounts based on implementation cost estimate obtained through market research and leveraging an internal IT knowledge base. Specifically, implementation cost estimates ranged from \$350 thousand to \$1 million, so PG&E used the midpoint implementation cost estimate of \$675 thousand to calculate rebate levels. PG&E designed the rebate to encourage EVSPs to enroll PG&E BEV Account Holders on the DAHRTP BEV rate. To do this, PG&E set a rebate level that increases as EVSPs enroll more customer sites on the rate, with a maximum rebate amount, to ensure diversity in the number of EVSPs who receive rebates.

PG&E designed the rebates to cover a portion of estimated implementation costs and varied the amount of costs the rebates cover between EVSP Suppliers and EVSP Owners, for several reasons. First, PG&E assumed that EVSP Suppliers would have higher implementation costs because they not only need to upgrade their software to discover DAHRTP BEV rate pricing, but they also need to update customer interfaces to display pricing for a myriad of diverse customers. Further, PG&E structured the rebate to encourage EVSP Suppliers to enroll multiple customer sites on the DAHRTP BEV rate. EVSP Owners can make systematic and homogenous decisions to enroll their sites in the

DAHRTP BEV rate. EVSP Suppliers do not own their sites and must encourage a non-homogenous set of customers to enroll in the DAHRTP BEV rate to maximize their incentive. Finally, PG&E determined that EVSP Owners with onsite battery storage have an economic incentive to enroll in DAHRTP BEV rate. Therefore, the maximum rebate amount, a percentage of the mid-point implementation cost estimate, is ~50% of costs for EVSP Suppliers and ~20% of costs for EVSP Owners.

Higher rebate levels are designed to encourage participation by the customers with sites located in the AB841 Prioritized Communities¹¹ (PC). As the Decision explicitly sets the goal of enrolling at least three small business customers in the rate within 24 months of the launch, a higher rebate is also available for small business¹² customers.

Finally, PG&E explicitly included a PG&E BEV Account Holder rebate to incentivize site hosts who enroll in the DAHRTP BEV alongside an EVSP Supplier. PG&E believes this will facilitate recruitment and, by requiring participating PG&E BEV Account Holders to share data, this will enable data collection necessary for evaluation purposes.

PG&E's DAHRTP BEV Rebate Program rebate structure for EVSP Owners can be seen in Table 1 and EVSP Suppliers and PG&E BEV Account Holders in Table 2.

Table 1: DAHRTP BEV Rebate Structure, EVSP Owner

EVSP Owner Model	Rebate Per Site	Max Rebate Per EVSP
Participating Public DCFC	\$3,000	\$135,000
AB841 PC Adder	+\$1,500	

¹¹ AB 841 (Ting – 2020) establishes criteria for future transportation electrification programs to serve “underserved communities.” AB 841 defines “underserved communities” as inclusive of any of the following: Is a “disadvantaged community” as defined by subdivision (g) of Section 75005 of the Public Resources Code; Is included within the definition of “low-income communities” as defined by paragraph (2) of subdivision (d) of Section 39713 of Health and Safety Code; Is within an area identified as among the most disadvantaged 25 percent in the state according to the CalEPA and based on the most recent California Communities Environmental Health Screening Tool, also known as CalEnviroScreen; Is a community in which at least 75 percent of public school students in the project area are eligible to receive free or reduced-price meals under the National School Lunch Program; Is a community located on lands belonging to a federally recognized California Indian tribe. PG&E refers to the communities identified in AB 841 as AB 841 prioritized communities, “AB 841 PCs,” rather than “underserved communities.” PG&E believes this change in nomenclature is important as it takes away any potential negative stigma associated with these communities and instead highlights these communities in a positive light as areas of priority.

¹² Small Business Customer Definition: A non-residential Customer who: (1) has a maximum billing demand of 20 kW, or less, per meter during the most recent 12-month period, or (2) has an annual usage of 40,000 kWh, or less, during the most recent 12-month period, or (3) meets the definition of a “micro-business” under California Government Code 14837. PG&E Tariff Rulebook, p.32: https://www.pge.com/tariffs/assets/pdf/tariffbook/ELEC_RULES_1.pdf

Table 2: DAHRTP BEV Rebate Structure, EVSP Suppliers and PG&E BEV Account Holders

EVSP Supplier Model and PG&E BEV Account Holders (system integration)	Rebate Per Site	Max per EVSP
Participating EVSP Base Rebate	\$7,500	\$350,000
AB841 PC or Small Business Adder	+\$3,750	
Participating BEV Site Host Base Rebate	\$500	
AB841 PC or Small Business Adder	+\$750	
Kicker for the first 20 sites	\$1,250	\$25,000

The EVSP Supplier rebate is designed to encourage participating EVSPs to enroll multiple customers, as the \$350,000 cap allows for approximately 30 sites. Adders are available on a per site basis, in addition to the base rebate. For example, if a participating EVSP Supplier recruits and provides technology upgrades to a small business customer with a single site, the EVSP would receive a base rebate of \$7,500 plus a \$3,750 adder for a total of a \$11,250 rebate. Adders cannot be stacked and only one adder per site is available. In the above example, if the EVSP recruits and provides technology upgrades to a small business site located in the AB841 PC, the rebate will still be \$11,250. However, if this site ends up being one of the first 20 transitioned to the DAHRTP BEV rate, with the additional \$1,250 kicker, the total rebate for that site would be \$12,500. The kicker for the first 20 sites does not count towards the maximum rebate per EVSP Supplier. In other words, EVSP Suppliers who recruit and make technology upgrades for the first 20 sites, may ultimately receive a cumulative rebate that is greater than \$350,000. The kicker for the first 20 sites is available for EVSP Suppliers only.

For PG&E BEV Account Holders who might adopt the rate without automation, a rebate will be available in exchange for data collection. This rebate can be seen in Table 3, DAHRTP BEV Rebate for Non-Automated PG&E BEV Account Holders.

Table 3: DAHRTP BEV Rebate for Non-Automated PG&E BEV Account Holders

PG&E BEV Account Holders (no system integration)	Rebate Per Site
BEV Site Host	\$500
AB841 PC or Small Business Adder	+\$750

Similarly to EVSP Supplier Model with system integration for PG&E BEV Account Holders, adders cannot be stacked and only one adder per site is available. For example, if the participating PG&E BEV Account Holder is a small business with a site located in AB841 PC, the rebate will be \$500 plus \$750 for a total of \$1,250.

PG&E requested the amount for technology incentives of \$1.295 million in the context of the pilot proposed in PG&E's testimony. The Commission did not change the technology incentives authorized amount when it decided that the real-time DAHRTP BEV rate should be an optional rate rather than a pilot. PG&E may experience a different number of requests for technology incentives than it had estimated for the pilot proposal. For that

reason, PG&E reserves the right to adjust rebate levels based on program demand at any time. If PG&E determines that the rebate levels or the Rebate Program should be adjusted, PG&E will submit revisions in a Tier 1 Advice Letter.

Application Process

Similar to other PG&E TE Programs, EVSPs and PG&E BEV Account Holders will be able to apply for a rebate online on a PG&E-hosted URL, or through a 3rd-party implementer. If program implementation is run internally, PG&E will utilize its custom Salesforce tool, Energy Insight, to collect applicant information and evaluate program eligibility. Participating EVSP Suppliers will be able to apply for the rebate on behalf of the PG&E BEV Account Holders. Rebates will be available on a first come first served basis. EVSP Owners and EVSP Suppliers will have 12 months after PG&E approves and accepts their application for a rebate to complete rate integration – be able to receive the rate signal, update the user interface to display hourly pricing signals to the end customer. PG&E will implement a pre-approval process to manage rebate budget based on the committed number of sites and manage expectations by the Rebate Program applicants. PG&E might require EVSPs to provide ongoing development progress reports to effectively manage Rebate Program budget. PG&E will pause the application process once the committed projects cumulative amount reaches the total rebate program budget and will continue to gauge Rebate Program interest by managing a waitlist. Applications on the waitlist will not be approved until funding is available for them. Applications on the waitlist will be prioritized over prior applications who do not complete development in the required timeframe.

PG&E will leverage established rebate payment tools to provide rebates to participants upon verification. EVSPs will receive 100% of the rebate amount once the technological updates have been completed for the participating site. PG&E BEV Account Holders might receive their portion of the rebate according to evaluation milestone schedules to encourage data collection (e.g., percentage upon completion of the rate enrollment survey, the remainder after being on the rate for a period of time).

Marketing, Education & Outreach (ME&O)

PG&E will partner with EVSPs on ME&O. Messaging about the rebate will be part of the program's broader outreach strategy and tactics to support the EVSP's efforts to promote rate adoption. This includes holding discussions with individual EVSPs to understand their sales process, how elements such as this rebate come into the sales process, and co-marketing materials that can be leveraged to explain how to take advantage of this rebate. For direct-to-consumer outreach, PG&E will also update any scripts used for one-to-one outreach and include rebate information as a component of online materials or collateral provided directly to customers and CCAs. PG&E plans to provide educational materials for site hosts on how to educate their customers on the benefits of the DAHRTP BEV rate. This ME&O could include information on pass-through pricing, where site hosts pass DAHRTP BEV pricing directly to customers, and custom pricing, where site hosts

create their own pricing, independent of the DAHRTP BEV rate. PG&E will endeavor to educate customers on the DAHRTP BEV rate and options for pricing but will stop short of providing methods to indirectly communicate price signals as this is the site host's responsibility.

In addition to general outreach efforts, PG&E will provide additional marketing support to promote the program specifically among AB841 PC and small business customers and will tailor the approach and outreach materials used to recruit these customer segments. This may include messaging the benefits of the program and rebate from a small and medium business perspective, partnering with local community organizations, and/or providing in-language materials.

Timeline

The Rebate Program will commence with the launch of the DAHRTP BEV rate, targeted for Q4 2023, with anticipated duration of up to 24 months to afford sufficient time for customer outreach, technology development, verification, and data collection. In the unlikely case of higher demand than anticipated, the Rebate Program will be available until budget is exhausted. The Rebate Program duration might be extended in case of low adoption.

Evaluation and Reporting

Per Decision, PG&E is required to develop an evaluation strategy of the rate and file annual reports following the implementation of the DAHRTP BEV rate for the first three years of the optional rate's availability. Participating EVSPs will be required to provide ongoing data reporting on a relevant metrics (e.g., number of participating sites, pass-through pricing information). Metrics relevant to the rebate program will be incorporated in the evaluation. Annual reports will include metrics such rate adoption, customer satisfaction and lessons learned. Evaluation plan will be filed in the Advice Letter, 45 days following the Workshop currently scheduled for March 24 2022, but no later than May 15 2022, as required by the Decision.

Annual Program Reporting pertaining to the rebate program will include, but not limited to:

- Rebate Adoption by customer segments, by use case
- Customer satisfaction with the rebate program collected via survey
- Key drivers for DAHRTP BEV rate enrollment (e.g., Does the rebate program encourage more customers to enroll?)
- Feedback received via multiple channels
- Rate choice prior to adoption to DAHRTP BEV rate for existing BEV rate customers
- Additional information and metrics, as defined by the third-party evaluator in charge of the overall DAHRTP BEV rate evaluation.

Additional Considerations

PG&E hypothesizes that the demand and cost savings potential for the proposed DAHRTP BEV rate will vary substantially among different customer segments within the BEV customer class. Any dynamic rate has a unique set of opportunities and barriers to adoption, due to the rate's complexity and the need for customer-side technology that enables the customer to charge based on dynamic price signals. These take different forms for different customer groups and, consequently, may affect customer experience differently. Due to all these factors, the Rebate Program participation may be impacted and the Rebate Program approach might need to be adjusted based on the learnings after the launch.

The submittal would not increase any current rate or charge, cause the withdrawal of service, or conflict with any rate schedule or rule.

Protests

Anyone wishing to protest this submittal may do so by letter sent electronically via E-mail, no later than March 9, 2022, which is 20 days after the date of this submittal. Protests must be submitted to:

CPUC Energy Division
ED Tariff Unit
E-mail: EDTariffUnit@cpuc.ca.gov

The protest shall also be electronically sent to PG&E via E-mail at the address shown below on the same date it is electronically delivered to the Commission:

Sidney Bob Dietz II
Director, Regulatory Relations
c/o Megan Lawson
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 and 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).

Effective Date

Pursuant to General Order (GO) 96-B, Rule 5.2, this advice letter is submitted with a Tier 2 designation. PG&E requests that this Tier 2 advice submittal become effective on regular notice, March 19, 2022 which is 30 calendar days after the date of submittal.

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.20-10-011. 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 submittals can also be accessed electronically at: <http://www.pge.com/tariffs/>.

/S/

Sidney Bob Dietz II
Director, Regulatory Relations

cc: Service List A.20-10-011



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 U39 E)

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) #: 6506-E

Tier Designation: 2

Subject of AL: Day Ahead Hourly Real Time Pricing Business Electric Vehicle Rebate Program Proposal

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.21-11-017

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: 3/19/22

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

California Public Utilities Commission
Energy Division Tariff Unit Email:
EDTariffUnit@cpuc.ca.gov

Contact Name: Sidnev Bob Dietz II. c/o Megan Lawson
Title: Director, Regulatory Relations
Utility/Entity Name: Pacific Gas and Electric Company

Telephone (xxx) xxx-xxxx:
Facsimile (xxx) xxx-xxxx:
Email: PGETariffs@pge.com

Contact Name:
Title:
Utility/Entity Name:

Telephone (xxx) xxx-xxxx:
Facsimile (xxx) xxx-xxxx:
Email:

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

Clear Form

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

AT&T
Albion Power Company

Alta Power Group, LLC
Anderson & Poole

Atlas ReFuel
BART

Barkovich & Yap, Inc.
Braun Blasing Smith Wynne, P.C.
California Cotton Ginners & Growers Assn
California Energy Commission

California Hub for Energy Efficiency
Financing

California Alternative Energy and
Advanced Transportation Financing
Authority
California Public Utilities Commission
Calpine

Cameron-Daniel, P.C.
Casner, Steve
Center for Biological Diversity

Chevron Pipeline and Power
City of Palo Alto

City of San Jose
Clean Power Research
Coast Economic Consulting
Commercial Energy
Crossborder Energy
Crown Road Energy, LLC
Davis Wright Tremaine LLP
Day Carter Murphy

Dept of General Services
Don Pickett & Associates, Inc.
Douglass & Liddell

East Bay Community Energy Ellison
Schneider & Harris LLP Energy
Management Service
Engineers and Scientists of California

GenOn Energy, Inc.
Goodin, MacBride, Squeri, Schlotz &
Ritchie

Green Power Institute
Hanna & Morton
ICF
International Power Technology

Intertie

Intestate Gas Services, Inc.
Kelly Group
Ken Bohn Consulting
Keyes & Fox LLP
Leviton Manufacturing Co., Inc.

Los Angeles County Integrated
Waste Management Task Force
MRW & Associates
Manatt Phelps Phillips
Marin Energy Authority
McClintock IP
McKenzie & Associates

Modesto Irrigation District
NLine Energy, Inc.
NRG Solar

OnGrid Solar
Pacific Gas and Electric Company
Peninsula Clean Energy

Pioneer Community Energy

Public Advocates Office

Redwood Coast Energy Authority
Regulatory & Cogeneration Service, Inc.
SCD Energy Solutions
San Diego Gas & Electric Company

SPURR
San Francisco Water Power and Sewer
Sempra Utilities

Sierra Telephone Company, Inc.
Southern California Edison Company
Southern California Gas Company
Spark Energy
Sun Light & Power
Sunshine Design
Tecogen, Inc.
TerraVerde Renewable Partners
Tiger Natural Gas, Inc.

TransCanada
Utility Cost Management
Utility Power Solutions
Water and Energy Consulting Wellhead
Electric Company
Western Manufactured Housing
Communities Association (WMA)
Yep Energy