

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE  
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September 7, 2022

**Advice Letter 6552-E and 6552-E-A**

Sidney Bob Dietz II  
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Pacific Gas and Electric Company  
77 Beale Street  
San Francisco, California 94177  
E-mail: PGETariffs@pge.com

**SUBJECT: BEV Rate Performance SB 350 SRP Annual Report 2021**

Dear Mr. Dietz:

Advice Letter 6552-E, 6552-E-A is effective as of April 1, 2022.

Sincerely,

A handwritten signature in black ink that reads "Leuwam Tesfai".

Leuwam Tesfai  
Deputy Executive Director for Energy and Climate Policy  
Director, Energy Division

May 3, 2022

**Advice 6552-E-A**

(Pacific Gas and Electric Company U 39 E)

Public Utilities Commission of the State of California

**Subject: Supplemental: BEV Rate Performance SB 350 SRP Annual Report  
2021**

**Purpose**

Pacific Gas and Electric Company (“PG&E”) respectfully submits this supplemental Advice Letter to update the attachments submitted in Advice Letter (“AL”) 6552-E. In its original submittal, PG&E inadvertently omitted the narrative of attachment 1 submitted in Advice Letter 6552-E. The narrative is now attached as Attachment 1. Additionally, PG&E discovered an error in the attached data report, where the data was incorrectly populated in the Load Data table. Starting from the column “Count of Sites using utility meter data,” the values were shifted by two columns to the left, resulting in all subsequent columns containing incorrect values. In the corrected attachment, now known as attachment 2, this error has been fixed. Pursuant to Decision 19-10-055 Ordering Paragraph 16, Pacific Gas and Electric Company (“PG&E” or “the Utility”) hereby submits Tier 1 Advice Letter containing the first BEV Rate Performance (BEV Report), which contains an annual report on commercial electric vehicle rate class performance.

While the hourly load data table in the attachment 2 is being updated in this supplemental Advice Letter, the rest of Advice Letter 6552-E remains unaltered. This supplemental Advice Letter partially replaces 6552-E.

**Background**

Per D.19-10-055 ordering paragraph 16, PG&E is required to submit an annual, information-only, Tier 1 Advice Letter containing a report on BEV rate performance including data presented at workshops. For 2021, PG&E was ordered to present anonymized data and insights across the five use cases with a focus on:

- Hourly energy and demand;
- Monthly bills based on that energy and demand data;
- Impacts of customer usage on the local distribution network;

- A representative survey of customers in the five use case categories regarding their experience on the BEV rate, their satisfaction with the rate, and their satisfaction with PG&E generally.

On September 23 2021, PG&E conducted a public workshop on BEV rate class performance from May 2020 through April 2021. The BEV Report details the analysis shared in the September 2021 workshop. The Workshop presented findings based on 12 months of data from May 2020 through April 2021. The findings in the BEV Report reflect data from January 2021 through December 2021. PG&E reports on data using the SB 350 template as required in D.19-10-055. The hourly energy and demand data is provided in the SB350 Data Template.

### **Protests**

PG&E requests that the Commission, pursuant to GO 96-B, General Rule 7.5.1, maintain the original protest and comment period designated in Advice Letter 6552-E and not reopen the protest period.

### **Effective Date**

PG&E requests that this Tier 1 Advice Letter submittal become effective concurrent with original Advice Letter 6552-E, which is April 1, 2022.

### **Notice**

In accordance with General Order 96-B, Section IV, a copy of this advice letter is being sent electronically to parties shown on the attached list and the parties on the service list for A.18-11-003 and R.18-12-006. Address changes to the General Order 96-B service list should be directed to PG&E at email address [PGETariffs@pge.com](mailto: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](mailto:Process_Office@cpuc.ca.gov). Send all electronic approvals to [PGETariffs@pge.com](mailto: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

Attachments: Attachment 1: Narrative Report  
Attachment 2: Data Report

cc: Service List: A.18-11-003 and R.18-12-006



# 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 (U 39 E)

Utility type:

- ELC       GAS       WATER  
 PLC       HEAT

Contact Person: Stuart Rubio

Phone #: (415) 973-4587

E-mail: PGETariffs@pge.com

E-mail Disposition Notice to: SHR8@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) #: 6552-E-A

Tier Designation: 1

Subject of AL: Supplemental: BEV Rate Performance SB 350 SRP Annual Report 2021

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: N/A

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: 4/1/22

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 proposed<sup>1</sup>: N/A

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

<sup>1</sup>Discuss 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](mailto: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: (415)973-2093  
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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

# **Attachment 1**

Narrative Report

# PACIFIC GAS AND ELECTRIC COMPANY

## Utility Report on Transportation Electrification SB 350 Business Electric Vehicle (BEV) Rate Annual Performance Report

Per Decision 19-10-055, OP 16

April 1, 2022



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## 2 Executive Summary

PG&E offers two Business Electric Vehicle (BEV) rates for business customers with on-site EV charging. These rates are designed to reduce the EV charging costs and encourage charging at off-peak times to both take advantage of renewable generation and reduce impact to the grid. Customers were able to enroll in BEV rates with basic functionality starting May 1<sup>st</sup>, 2020. The fully functional BEV rate and online cost comparison tool was made available on October 1<sup>st</sup>, 2020. PG&E originally called this the Commercial EV (CEV) rate in its application (Application (A.) 18-11-003) to the Commission and changed the name to the BEV rate upon rate launch<sup>1</sup>.

As of December 31, 2021 a total of 66 customers were enrolled in BEV rates across 403 sites within PG&E's territory. Most of the sites (seventy four percent) on BEV rate are Direct Current Fast Charging (DCFC). Many customers saved money by switching to the BEV rate, but for some customers, the rate is not optimized.<sup>2</sup> PG&E plans to analyze these customers for which the rate is not optimized in 2022 to better understand how to best support customers to get the most out of the BEV rate.

The BEV generation rate was intentionally designed with a very high peak rate to encourage load shifting to off-peak. Despite high peak rates, hourly load profiles show that customers on BEV rates tend to not shift their usage to off-peak times. PG&E analyzed the cost to serve BEV customers and determined that BEV customers incur higher overall distribution costs but lower overall generation costs when compared to benchmark customers.<sup>3</sup>

Per Decision (D.) 19-10-055<sup>4</sup>, current BEV revenues are based on 2017 GRC marginal costs that were estimated using the benchmark rate classes. However, 2020 GRC marginal cost estimates are almost twice as much as the 2017 estimates. Given this increase in marginal costs, as well as the cost-of-service results for BEV customers provided in this report, PG&E recommends that BEV distribution rates should be increased to ensure the full cost of service is recovered.

In order to evaluate the customer experience with the BEV rate and explore the level of interest amongst eligible customers not on a BEV rate, PG&E enlisted a third-party vendor to conduct interviews of participating and non-participating EV customers. Two main learning outcomes are: (1) BEV rate participants were satisfied with the rate overall, while noting challenges with subscription model management and preference for automatic subscription level adjustment, and (2) non-BEV participants lacked awareness of the BEV rate offering.

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<sup>1</sup> <http://www.pge.com/businessevrate>

<sup>2</sup> This is common across all rate classes – PG&E has identified over 448,000 customers who could use a more optimal rate plan.

<sup>3</sup> Small Commercial A1 and A6 customers are the benchmark for BEV-1, Medium/Large commercial E19S customers for BEV-2.

<sup>4</sup> <https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M318/K552/318552527.PDF>

## 3 Program Background

### 3.1 Overview

PG&E offers two electric vehicle (EV) rate plans for business customers with on-site EV charging, Business EV 1 (BEV-1) and Business EV 2 (BEV-2). These rates are specifically designed for customers with separately metered EV charging at locations. Today, BEV customers self-select into five different use case categories: Direct Current Fast Chargers (DCFC), Public transit (Transit), Workplace, Medium-Duty Fleets (Fleet), and Multifamily Housing (MFH). Customers who do not self-select into one of the five use cases are given a designation of “Other.” These new rate plans help customers meet EV charging needs, while keeping fuel costs lower than gasoline or diesel alternatives. Customers on BEV rates have a choice of subscription level, based on their charging needs:

- **Business Low Use EV Rate – BEV-1:** For EV charging installations up to and including 100 kilowatts (kW). Best suited for smaller workplaces and multi-unit dwellings.
- **Business High Use EV Rate – BEV-2:** For EV charging installations of 100 kilowatts (kW) and above. Best suited for sites with fleets and fast-charging stations.

Both plans combine an innovative and novel customizable monthly subscription charge with a time-of-use rate to help save money. The key components of the BEV rates are:

- **Monthly subscription charge:** Customers can choose a subscription level based on their maximum monthly EV charging kW consumption and this can be adjusted throughout the month as often as needed – until the last day of each billing cycle – to avoid overage fees.
- **Overage fees:** At the end of a billing cycle, if actual consumption (kW) exceeds the subscription level, an overage fee of two times the cost of one kW for each kW over the subscription level will be charged.
- **Grace period:** To help customers determine the best subscription level, a grace period with no overage fees for three billing cycles is provided during initial enrollment.
- **Time-of-use rate:** In addition to a monthly subscription charge, customers are charged a volumetric rate (kWh) based on energy usage and when that energy is used. Charging is the most affordable midday, when PG&E has higher levels of renewable energy generation. Time-of-use periods are consistent year-round with no seasonality.

### 3.2 Reporting Requirements

Per D.19-10-055 ordering paragraph 16<sup>5</sup>, PG&E is required to submit an annual, information-only, Tier 1 Advice Letter containing a report on BEV rate performance including data presented at workshops. For 2021, PG&E was ordered to present anonymized data and insights across the five use cases with a focus on:

- hourly energy and demand
- monthly bills based on that energy and demand data
- impacts of customer usage on the local distribution network
- and a representative survey of customers in the five use case categories regarding their experience on the BEV rate, their satisfaction with the rate, and their satisfaction with PG&E generally.

On September 23<sup>rd</sup> 2021, PG&E conducted a public workshop on BEV rate class performance from May 2020 through April 2021. The workshop provided insights into recorded revenues and “shadow rate” revenues from the BEV rate class, including a disaggregation of those BEV revenues that are from new, incremental BEV customers and those that are from customers that switch from an existing commercial rate.

This report details the analysis shared in the September 2021 workshop. The Workshop presented findings based on 12 months of data from May 2020 through April 2021. The findings in this report reflect data from January 2021 through December 2021. PG&E reports on data using the SB 350 template<sup>6</sup> as required in the D.19-10-055. Of note, the hourly energy and demand data is provided in the SB350 Data Template<sup>7</sup>.

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<sup>5</sup> DECISION APPROVING APPLICATION FOR PACIFIC GAS AND ELECTRIC COMPANY'S COMMERCIAL ELECTRIC VEHICLE RATES  
<https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M318/K552/318552527.PDF> Chapter 7, page 61.

<sup>6</sup> <https://www.cpuc.ca.gov/-/media/cpuc-website/divisions/energy-division/documents/sb-350-te/sb-350-srp-annual-report-template-mar-2021.docx>

<sup>7</sup> <https://www.cpuc.ca.gov/-/media/cpuc-website/divisions/energy-division/documents/sb-350-te/sb-350-data-template-feb-2021.xlsx>

## 4 Program Metrics

### 4.1 BEV Rate Adoption

As of December 31, 2021, there were a total of 66 unique customers enrolled in BEV rates across 403 sites within PG&E's service territory. Customers on the BEV rate fell into various use cases, ranging from a single site (e.g., MFHs) to 100+ sites (e.g., public DCFC networks). A breakout by energy service provider, as evidenced in the TABLE 4.1-1, shows a majority, approximately sixty-seven percent, of sites are unbundled and serviced by Community Choice Aggregators (CCA).

Rate	Unbundled (DA/CCA)	Full Service	Total
BEV-1	134	74	208
BEV-2	134	61	195
Total	268	135	403

Table 4.1-1 BEV Rate Enrollment

When stratified by geographic location—specifically counties—BEV rate adoption tends to be clustered in and around the Bay Area and highly correlated to locations with high EV penetration. As shown in FIGURE 4.1-1, Santa Clara, Alameda, San Mateo, and Fresno counties have the highest adoption with Mendocino, Shasta, Tulare, and Santa Barbara counties, located at the outskirts of PG&E's service territory, having the lowest adoption.

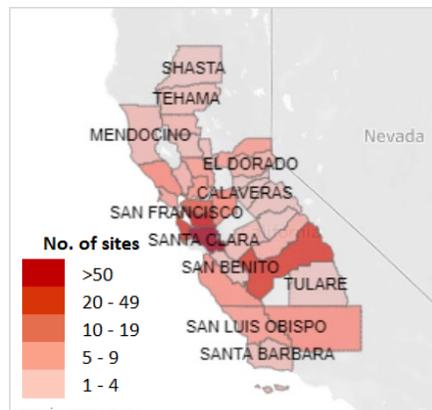


Figure 4.1-1 Geospatial BEV Rate Adoption

Looking at the BEV rate adoption across the five customer use cases in FIGURE 4.1-2, it is clear that public DCFC sites account for a majority of sites (seventy four percent) compared to all use cases<sup>8</sup>. This is not surprising as DCFC customers tend to be more engaged with their rates as they actively manage their electricity costs. PG&E notes that the medium and heavy-duty EV market is less mature than the light-duty market, which is reflected in the lower BEV rate adoption for the medium duty fleet and transit fleet use cases. Based on the findings of the customer research (see section 11.2 KEY LEARNINGS FROM INTERVIEWS WITH BEV CUSTOMERS), MFH and workspace customers tend to not be as engaged with electric rates of the EV chargers, and many are still on the same non-BEV rate when they first installed the charging infrastructure.

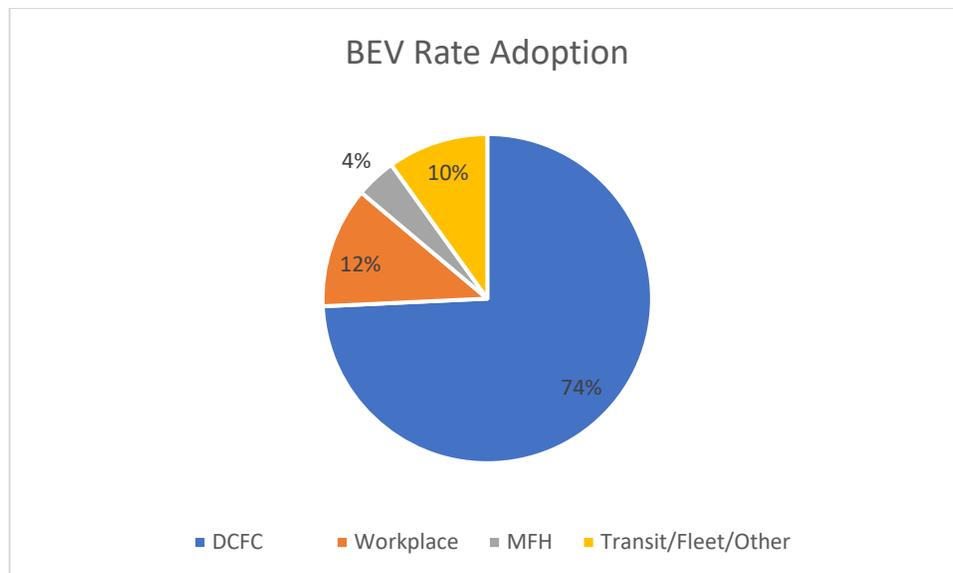


Figure 4.1-2 BEV Adoption per Use Case

The first 19 months of data presented in this report is considered a baseline and subsequent annual reports are likely to reveal more in-depth reflections on adoption trends.

#### 4.2 PG&E Transportation Electrification (TE) Programs Customer Rate Selection

PG&E assessed BEV rate adoption in two of its Transportation Electrification (TE) infrastructure programs, Electric Vehicle Charge Network (EVCN) and Electric Vehicle Fleet (EV Fleet) and discovered interesting contrasting results. There was a much higher adoption as a percentage of participants in PG&E’s EV Fleet Program as compared to PG&E’s EVCN program. PG&E anticipates this difference is driven largely by overlap in the program implementation windows and BEV rate availability.

<sup>8</sup> Use cases bundled together due to low adoption rate. “Other” category includes customers who chose not to disclose their use case.

The EVCN program<sup>9</sup> was designed exclusively for customers charging at MFHs and workplaces and most of the installations in this program were completed prior to the launch of the BEV<sup>10</sup>. Consequently, as shown in FIGURE 4.2-1, there is a relatively low adoption of the BEV rate at both MFHs and workplaces participating in the EVCN program, twelve and nineteen percent respectively. Instead, most participants selected the B6 and legacy A6 rate<sup>11</sup>.

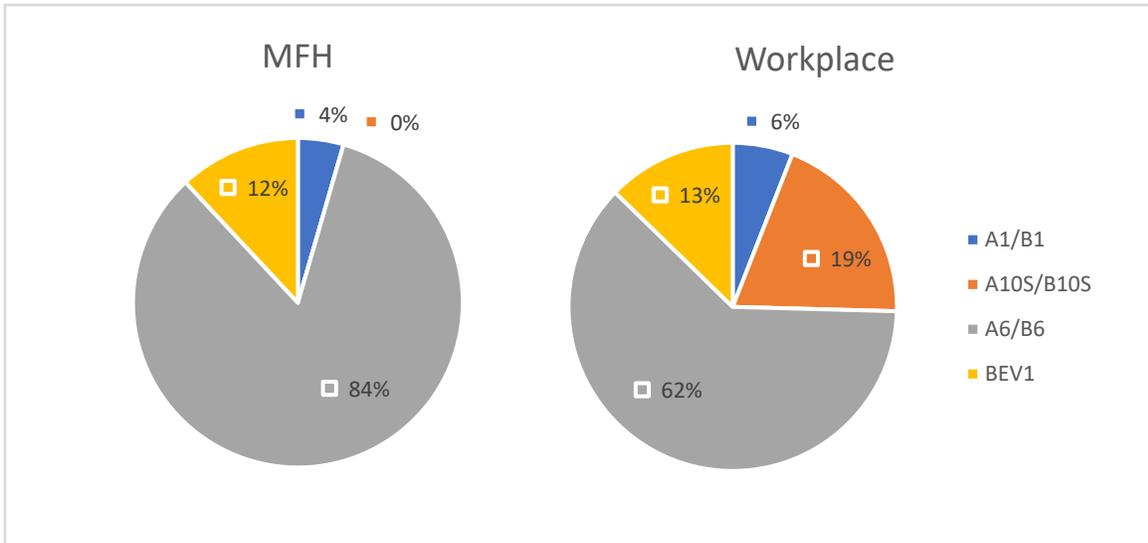


Figure 4.2-1 EVCN Program Participants Rate Selection

Based on the customer research (see 11.2 KEY LEARNINGS FROM INTERVIEWS WITH NON-BEV CUSTOMERS), customers who did not adopt the BEV rate typically were not aware of it. This presents an opportunity for Marketing, Education & Outreach (ME&O) in 2022.

Alternatively, in the EV Fleet Program<sup>12</sup>, which provides incentives to customers to build charging infrastructure to support medium and heavy duty EVs, all but one site energized to date has adopted the BEV rate. All activated sites within PG&E’s EV Fast Charge program<sup>13</sup> have elected to use the BEV rate. This was expected as modeled savings potential, detailed in the following section, was highest for DCFC sites. PG&E has seen strong demand for its EV Fast Charge program and anticipates to activate many more sites in 2022, which should lead to a more robust data set for analysis in the next iteration of this report.

<sup>9</sup> <https://www.pge.com/evchargenetwork>

<sup>10</sup> EVCN program was launched in 2018 and BEV rate became available in May 2020.

<sup>11</sup> All PG&E tariffs available at <https://www.pge.com/tariffs/index.page>

<sup>12</sup> <https://www.pge.com/evfleets>

<sup>13</sup> <http://www.pge.com/evfastcharge>

### 4.3 Modeled and Actual Business EV Rate Potential Savings

Prior to launching the BEV rate, PG&E developed a model to estimate customer bill impacts based on projected load shapes by use case and approved PG&E rates. Preliminary results<sup>14</sup> were presented in the BEV Rate Performance Public Workshop on September 23, 2021. FIGURE 4.3-1 shows the PG&E’s modeled potential savings of the BEV rate compared to applicable commercial rate plans prior to BEV rate launch. Based on the model, workplace and DCFC sites had the highest potential with a savings of up to \$0.28 per kWh when compared to comparable commercial rate plans, or \$2.16 per gallon when compared to gasoline/diesel. PG&E anticipated that MFH sites would see lower potential savings at \$0.04 per kWh, when compared to comparable commercial rate plans, or \$2.05 per gallon when compared to gasoline/diesel.

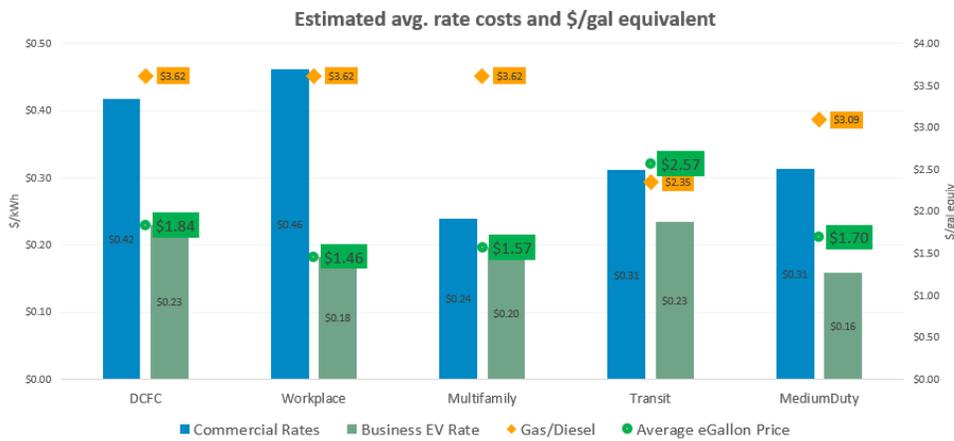


Figure 4.3-1 BEV Rate Potential Savings Model

PG&E updated the original model with actual load shapes based on 2021 PG&E BEV rate customer data, rate information and 2021 average gas/diesel prices, reflected in the FIGURE 4.3-2. This updated analysis reveals maximum savings potential for customers on BEV rate per use case. Similar to the original model, some Workplace and DCFC customers on BEV rate realized savings of up to \$0.25 per kWh, or up to \$2.57 per gallon. As expected, MFH customers, who tend to have the lowest monthly usage and demand, realized modest savings on BEV rate of up to \$0.06 per kWh, or up to \$2.63 per gallon. The analysis for the Fleet and Transit customers is inconclusive due to small sample size but align with the trend outlined in the original model.

<sup>14</sup> Commercial Rates as of May 2020 and preliminary billing estimates reflect the sample site modeled. Actual costs were expected to vary based on approved rate values, as well as individual site energy.

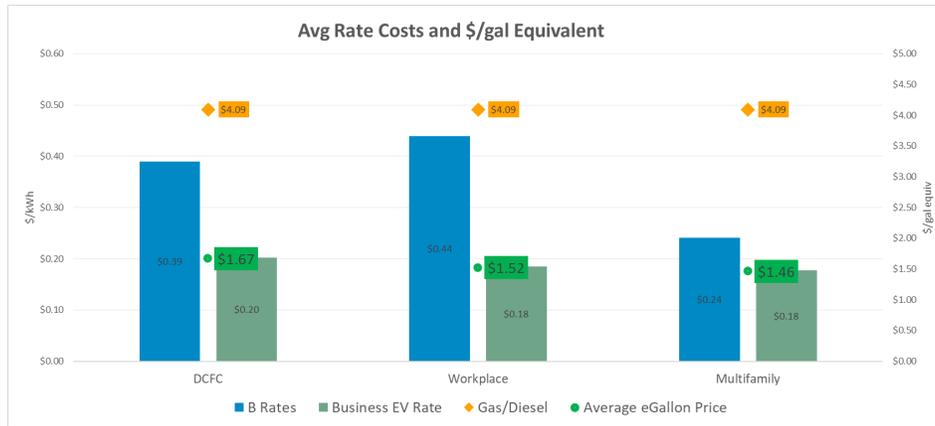


Figure 4.3-2 BEV Rate Maximum Actual Savings Model per Use case

Aside from DCFC customers, who account for seventy four percent of all customers on BEV rate, adoption is still in its early stages in other use cases. As such, there is a wide range of usage and demand within the use cases. In future reports, with more customer adoption, PG&E can more precisely model savings per use case.

#### 4.4 Realized EV Rate Savings

Rate analysis of BEV customers has shown that many customers are on their optimum rate. That said, there are still a large percentage of customers across all use cases where additional optimization would result in increased savings<sup>15</sup>. As discussed in the previous chapter, aside from DCFC customers, who account for seventy four percent of all customers on BEV rate, there is still a fairly limited adoption in other use cases, so the information in the TABLE 4.4-1 indicates a trend to track: MFH customers stand to benefit most from improved optimization. Transit and Fleet use cases were omitted due to small sample size.

Rate	DCFC	MFH	Workplace
Optimized	56%	40%	55%
Not Optimized	44%	60%	45%

Table 4.4-1 BEV Rate Analysis

PG&E will dive deeper into this analysis in 2022 to help customers maximize savings from the BEV rate. Rate optimization strategies include but are not limited to:

<sup>15</sup> This is common across all rate classes, not only for BEV class rate – PG&E has identified over 448,000 customers who could use a more optimal rate plan across all sectors.

- Rate comparison against commercial rates as a better alternative for customers with lower overall usage (*e.g.*, workplaces)
- Moving customers from BEV-2 to BEV-1, especially if customer demand doesn't frequently exceed 100 kW
- Encouraging customers to deploy energy management techniques to manage their load to their subscriptions and to adhere to time of use (TOU) price signals

PG&E will also continue to highlight the availability of self-service customer tools such as:

- Business EV Rate Calculator<sup>16</sup>: A tool designed to model monthly costs based on vehicle type, vehicle count, charging patterns, and mileage.
- *YourAccount* rate comparison tool<sup>17</sup>: A tool designed to compare energy costs across multiple rates based on historical usage.

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<sup>16</sup> <https://fleets.pge.com/bev-rate>

<sup>17</sup> PG&E is working on a new Advanced "What If tool" to allow customers to optimize their annual rate using a BEV subscription value as an input. The enhancement is targeted for Q2 of 2022.

## 5 ME&O Efforts

In 2021, Marketing, Education and Outreach (ME&O) focused on integrating the BEV rate within the larger EV Fleet program outreach across the service territory including Disadvantaged Communities. The approach stacked available savings together to encourage potential business customers to adopt EVs. The BEV Rate served as a support message contributing to the larger savings potential making EV adoption more compelling, instead of messaging the BEV rate independently. Examples of outreach where the BEV rate was integrated include:

- presentations to potential EV Fleet customers
- webinars to a variety of fleet segments
- marketing emails encouraging engagement with EV Fleet content and encouraging customers to complete a customer interest form to learn more about the program

In addition, a paid digital campaign ran in the summer with two key partners, Bobit Media and ACT News, with the objective of educating fleets on the rate.

- For Bobit Media, an EV Fleet case study for San Joaquin Rapid Transit District<sup>18</sup> was offered for download, with the digital advertisement reaching 77,544 customers and receiving 1,484 engagements.
- For ACT News, executive interviews were published for two PG&E EV Fleet customers, San Joaquin Rapid Transit District and Safeway. For these two customers, the BEV rate was a key component of their EV Fleet case study. In addition, digital advertisement, newsletter inclusion and sponsored emails were used to promote the BEV rate. The campaign resulted in 3,075 engagements with content that encouraged fleets to electrify.

## 6 D&I Efforts

This section of the SB 350 template for program reporting is not applicable for the BEV Rate performance report.

## 7 Project Safety

PG&E TE programs adhere to all safety requirements as indicated in the Transportation Electrification Safety Requirements Checklist provided in Decisions 18-01-024 and 18-05-040. Advice Letter 5695-E “Description of PG&E's Safety Requirements Checklist Compliance Efforts for the SB350 Standard Review Projects” describes these compliance efforts in detail.

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<sup>18</sup> [https://www.pge.com/pge\\_global/common/pdfs/solar-and-vehicles/your-options/clean-vehicles/charging-stations/ev-fleet-program/sjrtd-case-study.pdf](https://www.pge.com/pge_global/common/pdfs/solar-and-vehicles/your-options/clean-vehicles/charging-stations/ev-fleet-program/sjrtd-case-study.pdf)

## 8 Equipment Standards

This section of the SB 350 template for program reporting is not applicable for the BEV Rate performance report.

## 9 Costs

### 9.1 Introduction to Cost and Rate Analysis

At a very high level, PG&E designs rates to recover a certain amount of revenue based on expectations of customers' usage patterns and other attributes. In theory, rates should recover the full cost of serving customers. The initial rate design for the BEV-1 and BEV-2 rate schedules was developed before any actual data for BEV customers' usage patterns was available. Therefore, PG&E used the assumed load profiles from the five use cases as well as cost data from other existing rate schedules as proxies for the costs and attributes that might be expected of BEV customers. Particularly, small commercial A1 and A6 customers served as the proxy for BEV-1, and E19S schedule (medium to larger commercial customers) was the proxy for BEV-2.

The BEV rates contain three intentional changes from standard cost-based rate making: (1) they include an artificially high peak period rate, to incentivize customers to avoid charging during that period; (2) they contain no seasonal price differences as it was hypothesized that BEV customers will not change their usage behavior seasonally; and (3) they only collect distribution revenues equal to the 2017 GRC marginal costs estimated in A.18-11-003, as ordered by D.19-10-055.

Since the launch of the BEV rates in May of 2020, PG&E has collected actual usage data for customers who enrolled on the BEV-1 and BEV-2 schedules. As a result, PG&E can now calculate the actual cost of serving BEV customers and benchmark those costs against the A1/A6/E19S costs originally used for rate design. SECTION 9.2 BEV COST OF SERVICE ANALYSIS below describes the methods for calculating cost of service and discusses the results of benchmark comparisons. The analysis shows that BEV customers generally have much higher distribution costs than were originally estimated, but collect higher generation revenues.

Because the generation rates were intentionally not standard cost-based rates, PG&E used the BEV costs to calculate "shadow rates" which more closely reflect actual marginal costs and contain seasonality. The shadow rates can subsequently be benchmarked against the actual rates to determine if the actual rates are over-collecting or under-collecting revenue for distribution and generation costs. SECTION 9.3 CUSTOMER USAGE IMPACT below provides details on the shadow rate analysis and shows that BEV rates generally over-collect generation revenue.

A hypothetical full-cost analysis, as is typically done in a GRC Phase II, is also presented for the BEV class. It shows that, currently, BEV customers are collecting distribution revenues that are far less than their estimated marginal costs and full cost of service. Generation revenues for BEV customers are higher than the full cost of service because customers are using more of the high-priced peak usage than

forecasted. This full cost analysis serves as a preview of the rate changes that may be in store for the BEV class in PG&E’s next GRC Phase II.

## 9.2 BEV Cost of Service Analysis

In designing any rate, PG&E calculates distribution and generation costs on a per-kWh basis for the four cost categories shown in FIGURE 9.2-1 below. Specifically, the cost-per-kWh metric is based on “marginal cost revenue” (MCR) per-kWh, where MCR is the product of a unit marginal cost (dollar per unit) times the number of respective units, known as “cost drivers” (*i.e.*, Peak Capacity Allocation Factor (PCAF) kW, kWh, etc.). The MCR-per-kWh metric allows for apples-to-apples comparison of actual costs of BEV customers compared to the costs for the A1/A6 and E19S customers (henceforth referred to as “benchmark” customers) originally used for designing the BEV rates.

Service Components		Cost Driver
Distribution Capacity Cost	Primary	Hourly Circuit-level Peak Capacity Allocation Factor (PCAF) kW
	Secondary	Annual Final Line Transformer (FLT) kW
Generation Cost	Capacity	Hourly System-level PCAF kW
	Energy	Hourly kWh

Figure 9.2-1 MCR Categories and Cost Drivers

The unit marginal costs used in this analysis are based on PG&E’s latest General Rate Case (GRC) Phase II A.19-11-019<sup>19</sup> and are the same for both BEV and benchmark customers. Thus, the comparisons of MCR-per-kWh essentially reflects the cost impact resulting from differences in cost drivers for BEV customers compared to their benchmarks. Overall, PG&E’s analysis shows that BEV customers tend to incur higher overall distribution costs but lower overall generation costs when compared to benchmark customers.

BEV cost drivers are based on hourly historical customer interval data from 2021. Benchmark cost drivers are based on 2017 historical interval data for distribution costs, and forecasted 2021 data for generation costs, which is consistent with the data used in PG&E’s 2020 GRC Ph. II.

Sections 9.2.1 through 9.2.5 below provide the cost-of-service results and benchmark comparisons for each of the four cost categories.

<sup>19</sup> <https://docs.cpuc.ca.gov/PublishedDocs/SupDoc/A1911019/2908/344014273.pdf> Chapters 2 and 7 for unit marginal costs; Chapters 3 and 8 for cost drivers.

### 9.2.1 Final Line Transformer (FLT) Cost of Service

Final line transformer (FLT) kW is a measurement of annual non-coincident demand at the final line transformer. FLT is the closest transformer to the customer, and the magnitude of a customer’s non-coincident demand determines how large the transformer needs to be to serve that customer. Therefore, customers with higher FLT kW require larger and more expensive transformers than customers with lower FLT kW. TABLE 9.2-1 below compares the BEV FLT cost-of-service to its respective benchmarks.<sup>20</sup>

	BEV1	A1/A6	BEV2	E19S
Average Hourly kWh (Per Customer)	5.27	2.16	108.47	52.7
Average FLT kW (Per Customer)	73.16	7.91	523.93	105.81
Average Load Factor (Per Customer)	0.07	0.27	0.21	0.5
Secondary MRC per kWh (Class)	\$0.00284	\$0.00085	\$0.00126	\$0.00048
New Business MCR per kWh (Class)	\$0.04634	\$0.01366	\$0.01970	\$0.00766

Table 9.2-1 BEV Rate Secondary Distribution Capacity Cost Benchmark Comparison

TABLE 9.2-1 shows that BEV Customers have much higher FLT kW and lower load factors<sup>21</sup> than their benchmarks. Both BEV-1 and BEV-2 customers have FLT kW five to ten times greater than that of their benchmarks, meaning BEV customers generally require much larger, more expensive transformers than A1/A6/E19S customers. Additionally, the very low load factors compared to their benchmarks means the BEV customers have much less average kWh relative to their FLT kW, which means that there is less relative kWh to spread the costs across. As a result, BEV customers had much higher MCR-per-kWh than their benchmarks.

<sup>20</sup> Note that PG&E’s GRC includes two cost categories, Secondary and New Business, which are applicable to FLT kW. Table 9-2 shows MCR-per-kWh for both categories. Details on what the cost categories represent can be found in Chapter 7 of PG&E’s GRC Ph. II application cited in the previous footnote.

<sup>21</sup> Load factor is the ratio of average hourly kW to annual maximum kW. This metric average “utilization” of a distribution asset, i.e., the percent of available capacity being used on average.

### 9.2.2 BEV Hourly Load Profiles

TABLE 9.2-2 below presents a normalized load distribution by month and hour, where the percentage value is the total monthly kWh for a particular hour divided by the total kWh for that month. BEV customers exhibit very consistent load profiles across all months. Both rates tend to peak before the 4-9 pm TOU Peak Hours (framed in red) but maintain moderate load during the 4-9 pm period. Additional load data and metrics are provided in the SB 350 Data Excel Report. For the purpose of comparing BEV costs to benchmarks by TOU period in the following sections, the analysis applies the same TOU period definition for BEV customers that are used for benchmark customers<sup>22</sup>.

BEV1												BEV2													
	1	2	3	4	5	6	7	8	9	10	11	12		1	2	3	4	5	6	7	8	9	10	11	12
1	3%	2%	2%	2%	2%	2%	2%	2%	2%	2%	2%	2%	1	1%	1%	1%	1%	1%	1%	1%	1%	1%	1%	1%	
2	2%	2%	1%	1%	1%	1%	1%	1%	1%	1%	1%	2%	2	1%	0%	1%	1%	1%	1%	1%	1%	1%	1%	1%	
3	2%	2%	1%	1%	1%	1%	1%	1%	1%	1%	1%	1%	3	0%	0%	0%	0%	0%	1%	1%	1%	1%	1%	1%	
4	2%	1%	1%	1%	1%	1%	1%	1%	1%	1%	1%	1%	4	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	
5	2%	1%	1%	1%	1%	1%	1%	1%	1%	1%	1%	1%	5	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	
6	2%	1%	1%	1%	1%	1%	1%	1%	1%	1%	1%	1%	6	1%	1%	1%	1%	1%	1%	1%	1%	1%	1%	1%	
7	2%	2%	2%	1%	1%	2%	2%	2%	2%	2%	2%	1%	7	1%	1%	1%	1%	1%	1%	1%	1%	1%	1%	1%	
8	2%	2%	2%	2%	2%	3%	2%	3%	3%	2%	3%	2%	8	2%	2%	2%	2%	2%	2%	2%	2%	2%	2%	2%	
9	4%	4%	4%	4%	4%	4%	4%	4%	5%	5%	4%	4%	9	3%	4%	4%	4%	4%	4%	4%	5%	5%	5%	4%	
10	5%	5%	5%	5%	5%	5%	5%	5%	6%	6%	7%	9%	10	5%	5%	5%	5%	5%	5%	5%	6%	6%	6%	6%	
11	5%	6%	6%	6%	6%	6%	6%	6%	6%	6%	7%	8%	11	6%	6%	6%	6%	6%	6%	6%	6%	6%	6%	6%	
12	6%	7%	6%	7%	6%	6%	6%	6%	6%	7%	7%	8%	12	7%	7%	7%	7%	7%	6%	6%	7%	7%	7%	7%	
13	7%	7%	7%	7%	7%	7%	7%	7%	7%	7%	8%	8%	13	8%	8%	8%	8%	7%	7%	7%	7%	7%	7%	8%	
14	7%	7%	7%	7%	7%	7%	7%	7%	7%	7%	7%	8%	14	8%	8%	8%	8%	7%	7%	7%	7%	7%	7%	8%	
15	7%	7%	7%	7%	7%	7%	7%	7%	6%	7%	6%	7%	15	8%	8%	8%	8%	7%	7%	7%	7%	7%	7%	8%	
16	7%	7%	7%	7%	7%	7%	7%	7%	6%	7%	7%	6%	16	9%	8%	8%	8%	7%	7%	7%	7%	7%	7%	7%	
17	7%	7%	7%	7%	7%	7%	7%	7%	7%	7%	6%	5%	17	9%	8%	8%	8%	8%	7%	7%	7%	7%	7%	7%	
18	7%	7%	7%	7%	7%	7%	7%	7%	7%	7%	6%	5%	18	8%	8%	8%	8%	7%	7%	7%	7%	7%	7%	7%	
19	6%	6%	7%	7%	7%	7%	7%	7%	6%	6%	6%	4%	19	7%	7%	7%	7%	7%	7%	7%	7%	6%	6%	6%	
20	5%	5%	5%	5%	6%	6%	6%	6%	6%	5%	5%	4%	20	5%	6%	6%	6%	6%	6%	7%	6%	6%	6%	6%	
21	4%	4%	4%	5%	5%	5%	5%	5%	5%	4%	4%	3%	21	4%	4%	5%	5%	5%	6%	6%	5%	5%	5%	5%	
22	3%	3%	3%	4%	4%	4%	4%	4%	4%	4%	3%	3%	22	3%	3%	4%	4%	4%	5%	5%	4%	4%	4%	4%	
23	3%	3%	3%	3%	3%	3%	3%	3%	3%	3%	3%	2%	23	2%	2%	2%	3%	3%	3%	3%	3%	3%	3%	3%	
24	3%	2%	2%	2%	2%	2%	2%	2%	2%	2%	2%	2%	24	1%	1%	1%	1%	2%	2%	2%	2%	2%	2%	2%	

Table 9.2-2 BEV Hourly Load Profiles

<sup>22</sup> The TOU period definition in the actual BEV rate are different from the TOU periods from the benchmark rate schedules.

### 9.2.3 Distribution Circuit Cost of Service

Distribution circuit costs reflect the cost of sizing a distribution circuit to meet the coincident demand of the customers it serves. The more energy customers demand at one time, the higher the coincident demand, and thus, larger, more expensive circuit equipment is necessary to meet the demand. PG&E calculates PCAF kW, which measures the top twenty percent of a circuit's hourly loads and measures each customer's demand contribution in those hours. Essentially, the higher PCAF kW a customer has, the more they are a contributor to the peak hours which drive cost on a circuit.

TABLE 9.2-3 below shows compares BEV and benchmark customers' total PCAF kW and kWh usage by TOU period, as well as the MCR per kWh for each TOU period. Because there are far fewer BEV customers than benchmark customers, the PCAF kW and kWh values for BEV are much smaller comparatively. However, normalizing PCAF MCR (the PCAF kW times unit marginal capacity cost) on a per-kWh basis accounts for the differences in class sizes and provides an apples-to-apples comparison between the BEV and benchmark classes.

	<u>BEV1</u>	<u>A1/A6</u>	<u>BEV2</u>	<u>E19S</u>
Summer On Peak PCAF kW	1,313	932,161	20,659	1,082,642
Summer On Peak kWh	1,249,597	731,913,183	19,856,184	1,046,615,458
Summer On Peak MCR/kWh	\$ 0.0528	\$ 0.0669	\$ 0.0509	\$ 0.0542
Summer Part Peak PCAF kW	362	423,379	7,779	530,604
Summer Part Peak kWh	815,958	587,627,203	13,176,435	816,163,155
Summer Part Peak MCR/kWh	\$ 0.0217	\$ 0.0347	\$ 0.0287	\$ 0.0309
Summer Off Peak PCAF kW	193	296,199	4,810	471,773
Summer Off Peak kWh	1,932,816	1,801,896,969	26,703,604	2,737,477,642
Summer Off Peak MCR/kWh	\$ 0.0048	\$ 0.0072	\$ 0.0085	\$ 0.0076
Winter On Peak PCAF kW	262	92,271	3,448	129,773
Winter On Peak kWh	1,813,223	1,159,688,968	33,564,621	1,772,037,054
Winter On Peak MCR/kWh	\$ 0.0070	\$ 0.0038	\$ 0.0049	\$ 0.0037
Winter Off Peak PCAF kW	175	87,486	2,258	130,431
Winter Off Peak kWh	4,127,747	3,476,946,475	58,058,615	5,488,321,889
Winter Off Peak MCR/kWh	\$ 0.0021	\$ 0.0011	\$ 0.0018	\$ 0.0011
Winter Super Off Peak PCAF kW	6	20,305	188	33,812
Winter Super Off Peak kWh	615,413	511,353,197	11,752,991	714,195,593
Winter Super Off Peak MCR/kWh	\$ 0.0004	\$ 0.0016	\$ 0.0007	\$ 0.0020

Table 9.2-3 BEV Rate Primary Distribution Capacity Cost Benchmark Comparison

BEV customers generally have lower MCR-per-kWh in the summer periods, with the exception that BEV-2 customers have higher MCR-per-kWh in the Summer Off-Peak period. Inversely, BEV customers have higher MCR-per-kWh in the Winter On-Peak and Winter Off-Peak periods, compared to benchmarks, but lower MCR-per-kWh in the Winter Super Off-Peak period. Given the MCR per kWh metric effectively represents the ratio of PCAF kW to total kWh usage, the differences in MCR per kWh values reflect how BEV and benchmark customers exhibit different ratios of PCAF kW to kWh in the various TOU periods.

#### 9.2.4 Generation Capacity Cost of Service

Generation capacity costs reflect the cost of having enough generation resources available to meet the maximum coincident demand for PG&E’s entire service territory. Like distribution circuit costs, generation capacity costs are measured using PCAF kW, with the difference that coincident demand is measured at the system level, rather than the circuit level. The generation capacity cost comparison is shown in TABLE 9.2-4 below.

	<u>BEV1</u>	<u>A1/A6</u>	<u>BEV2</u>	<u>E19S</u>
Summer On Peak PCAF kW	308	278,098	4,113	328,812
Summer On Peak kWh	274,295	250,696,071	4,214,239	279,319,663
Summer On Peak MCR/kWh	\$ 0.1076	\$ 0.1063	\$ 0.0935	\$ 0.1128
Summer Part Peak PCAF kW	39	39,813	504	49,621
Summer Part Peak kWh	181,068	203,847,217	2,926,751	219,117,110
Summer Part Peak MCR/kWh	\$ 0.0205	\$ 0.0187	\$ 0.0165	\$ 0.0217
Summer Off Peak PCAF kW	-	-	-	-
Summer Off Peak kWh	445,816	622,372,540	6,175,057	734,044,265
Summer Off Peak MCR/kWh	\$ -	\$ -	\$ -	\$ -
Winter On Peak PCAF kW	79	53,510	995	64,440
Winter On Peak kWh	392,520	389,551,607	7,042,225	471,010,202
Winter On Peak MCR/kWh	\$ 0.0193	\$ 0.0132	\$ 0.0135	\$ 0.0131
Winter Off Peak PCAF kW	1	1,191	11	1,551
Winter Off Peak kWh	944,697	1,176,202,518	13,271,769	1,464,718,452
Winter Off Peak MCR/kWh	\$ 0.0001	\$ 0.0001	\$ 0.0001	\$ 0.0001
Winter Super Off Peak PCAF kW	-	-	-	-
Winter Super Off Peak kWh	114,952	174,053,452	2,413,415	190,049,469
Winter Super Off Peak MCR/kWh	\$ -	\$ -	\$ -	\$ -

Table 9.2-4 BEV Rate Generation Capacity Cost Benchmark Comparison

Generation PCAF hours (*i.e.*, the hours with the highest generation capacity cost) are mostly concentrated during Summer On-Peak, with a much smaller amount of PCAF hours occurring during the Summer Part-Peak periods (and an even smaller number of hours occurring in the Winter On-Peak period.) Thus, customers with the highest demands during the Summer On-Peak period will generally have highest overall generation capacity costs.

TABLE 9.2-4 shows that BEV-1 customers have a similar, but lower, MCR-per-kWh in the Summer On-Peak period compared to the benchmark, but higher MCR-per-kWh in the Summer Part-Peak and Winter On-Peak periods. BEV-2 customers have lower MCR-per-kWh than their benchmark in the Summer On-Peak and Summer Part-Peak periods, and similar, but higher, MCR-per-kWh in the Winter On-Peak period. As with distribution circuit capacity MCR-per-kWh, the differences in generation capacity MCR-per-kWh between BEV and benchmark customers is a reflection of the various ratios of PCAF kW to total kWh on each period for the different customers.

### 9.2.5 Generation Energy Cost of Service

Lastly, generation energy cost is essentially the cost of generating energy on an hourly basis. Customers' hourly kWh usage is multiplied by the hourly marginal energy costs (MEC) to determine hourly MCR. The hourly MCR is then aggregated by TOU period and divided by total kWh by TOU period to calculate MCR-per-kWh. Thus, the MCR-per-kWh results shown in Table 9-6 below essentially reflect customers' weighted average hourly energy cost for each TOU period.

	<b>BEV1</b>	<b>A1/A6</b>	<b>BEV2</b>	<b>E19S</b>
Summer On Peak kWh	274,295	250,696,071	4,214,239	279,319,663
Summer On Peak MCR/kWh	\$ 0.0660	\$ 0.0661	\$ 0.0651	\$ 0.0668
Summer Part Peak kWh	181,068	203,847,217	2,926,751	219,117,110
Summer Part Peak MCR/kWh	\$ 0.0470	\$ 0.0483	\$ 0.0453	\$ 0.0496
Summer Off Peak kWh	445,816	622,372,540	6,175,057	734,044,265
Summer Off Peak MCR/kWh	\$ 0.0305	\$ 0.0333	\$ 0.0277	\$ 0.0341
Winter On Peak kWh	392,520	389,551,607	7,042,225	471,010,202
Winter On Peak MCR/kWh	\$ 0.0569	\$ 0.0563	\$ 0.0556	\$ 0.0564
Winter Off Peak kWh	944,697	1,176,202,518	13,271,769	1,464,718,452
Winter Off Peak MCR/kWh	\$ 0.0331	\$ 0.0363	\$ 0.0303	\$ 0.0373
Winter Super Off Peak kWh	114,952	174,053,452	2,413,415	190,049,469
Winter Super Off Peak MCR/kWh	\$ 0.0040	\$ 0.0050	\$ 0.0030	\$ 0.0046

Table 9.2-5 BEV Rate Generation Energy Cost Benchmark Comparison

TABLE 9.2-5 shows that BEV Customers have relatively similar, and in almost all cases lower, generation energy MCR-per-kWh in all periods compared to benchmarks. This means that typically BEV customers' load averages more in the lower-cost hours within a TOU period.

### 9.3 Customer Usage Impact

#### 9.3.1 Customer Usage Patterns

Prior to rolling out the BEV rate, customer use patterns were forecasted based on assumed load patterns for the five different use cases in the CEV rate application, A.18-11-003. The BEV rate was created with an intentionally high peak rate in order to actively discourage peak usage and generate as low of an off-peak rate as possible. However, upon reviewing data from the first full year of rate availability, PG&E determined that actual customers are using more peak energy than expected, even though the peak rate is set artificially high (see TABLE 9.3-1).

TOU Period	TOU Consumption	
	Forecasted	Actual
BEV-1		
On Peak	15%	29%
Off Peak	40%	38%
Super Off Peak	45%	33%
BEV-2		
On Peak	20%	33%
Off Peak	55%	34%
Super Off Peak	25%	33%

Table 9.3-1 BEV Rate Customer Usage Patterns

### 9.3.2 Customer TOU Usage Patterns

PG&E assumed in A.18-11-003 that BEV load usage would be constant month-to-month rather than seasonal. While usage per customer was fairly constant in 2020, the average usage per customer appears to be increasing throughout 2021. However, this appears to be due to new, larger customers joining the rate rather than any kind of seasonal behavior. TOU usage doesn't significantly vary month-to-month, as confirmed in FIGURE 9.3-1 below.

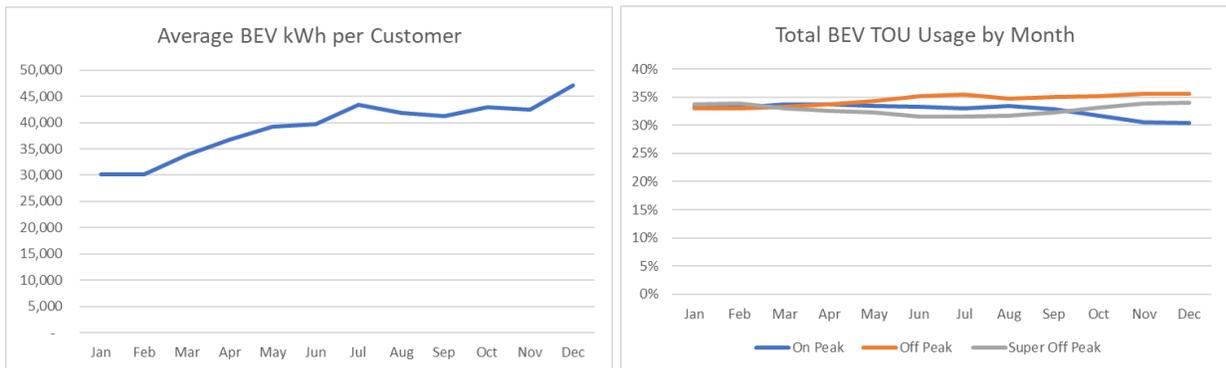


Figure 9.3-1 Seasonal and Monthly Variability of BEV Rate

### 9.3.3 Shadow Rates

As noted previously, the BEV generation rate was intentionally designed with a very high peak rate to encourage load shifting to off-peak and super off-peak hours. PG&E and other parties had some concerns with this approach because BEV customers might shift most of their usage to the off-peak period and cause a revenue undercollection. Therefore, this report compares actual revenues to a “shadow rate” that is more cost-based<sup>23</sup> and includes seasonality to determine if there is indeed undercollection. The analysis was conducted using data from both new EV customers and existing EV customers that switched from another rate schedule. The results show that the initial concern about undercollecting is not being realized, as customers are not avoiding the peak period as much as anticipated. TABLE 9.3-2 below compares the actual and shadow rates, as well as the revenues that would be collected from each. It shows that the current BEV generation rates collect 14 to 19 percent more revenue than would be collected from the cost-based shadow rates.

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<sup>23</sup> The shadow rate was designed prior to the availability of actual profile data for BEV customers and therefore reflects certain assumptions about BEV customers’ usage within each period, but this should have minimal impact on the final results and does not change the final conclusion.

BEV Gen Rate						Shadow Rate			
BEV1	Existing	New	Rate	Existing	New	Rate	Existing	New	
	kWh	kWh		Revenue	Revenue		Revenue	Revenue	
Summer On	133,834	140,461	0.25411	\$34,009	\$35,693	0.14982	\$20,052	\$21,045	
Summer Off	164,561	193,496	0.07155	\$11,774	\$13,845	0.10226	\$16,827	\$19,786	
Summer Super	131,059	137,768	0.04615	\$6,048	\$6,358	0.07603	\$9,964	\$10,474	
Winter On	183,362	209,158	0.25411	\$46,594	\$53,149	0.11109	\$20,370	\$23,236	
Winter Off	256,057	317,231	0.07155	\$18,321	\$22,698	0.08667	\$22,193	\$27,495	
Winter Super	242,147	244,215	0.04615	\$11,175	\$11,271	0.06132	\$14,848	\$14,975	
				<b>\$127,921</b>	<b>\$143,013</b>		<b>\$104,255</b>	<b>\$117,011</b>	19% 18%

BEV2						Shadow Rate			
BEV2	Existing	New	Rate	Existing	New	Rate	Existing	New	
	kWh	kWh		Revenue	Revenue		Revenue	Revenue	
Summer On	1,664,605	2,549,634	0.27180	\$452,440	\$692,991	0.15745	\$262,090	\$401,437	
Summer Off	2,157,048	2,718,573	0.06844	\$147,628	\$186,059	0.10832	\$233,654	\$294,479	
Summer Super	1,855,624	2,370,563	0.04304	\$79,866	\$102,029	0.08628	\$160,104	\$204,533	
Winter On	2,892,506	4,149,719	0.27180	\$786,183	\$1,127,894	0.12115	\$350,432	\$502,745	
Winter Off	3,683,280	4,508,609	0.06844	\$252,084	\$308,569	0.09673	\$356,283	\$436,117	
Winter Super	3,368,377	4,124,919	0.04304	\$144,975	\$177,537	0.07138	\$240,422	\$294,422	
				<b>\$1,863,176</b>	<b>\$2,595,078</b>		<b>\$1,602,985</b>	<b>\$2,133,733</b>	14% 18%

Table 9.3-2 Shadow Rates

### 9.3.4 Marginal Costs and Collected Revenue

PG&E performed an analysis that compares actual revenues collected with marginal costs and full cost revenues. Full cost revenues are higher than marginal cost revenues because they include fixed costs and PG&E's return on equity. PG&E's analysis of BEV costs and revenues shows that distribution rates should be increased to recover the currently estimated cost-of-service. Conversely, the analysis also revealed that BEV customers are likely overpaying for generation costs.

- Distribution Costs: As ordered in D.19-10-055, current BEV revenues can only collect the 2017 GRC marginal costs that were estimated using other rate classes (see 9.1 Introduction to Cost and Rate Analysis). However, the updated 2020 GRC marginal cost estimates are over 70 percent higher than the 2017 estimates. Because full cost revenues are even higher than marginal costs, distribution revenues would need to almost triple in order to align with other classes in order to collect full cost revenues. This is the type of increase that may be expected in PG&E's 2023 GRC Phase 2 (Next GRC).

- Generation Costs: PG&E found that BEV customers are using more peak energy than anticipated. Because of the artificially high peak energy rate, this means that BEV bundled customers are paying more than their generation cost of service. Generation rate design for BEV customers will be revisited in PG&E’s Next GRC, where any potential changes will be considered.

TABLE 9.3-3 below illustrates these revenues.

	Distribution			Generation		
	BEV1	BEV2	Total	BEV1	BEV2	Total
Revenue Collected	\$378,414	\$3,506,842	\$3,885,256	\$270,934	\$4,458,254	\$4,729,188
Marginal Cost Revenue	\$690,309	\$6,011,326	\$6,701,635	\$109,430	\$1,562,119	\$1,671,549
Full Cost Revenue	\$1,032,071	\$8,987,448	\$10,019,519	\$213,394	\$3,370,490	\$3,583,884

*Table 9.3-3 Actual, Marginal, and Full Cost Revenues*

### 9.3.5 Hypothetical Revenue Allocation

If the BEV rate class were included in the full cost of service analysis that was done for the 2020 GRC, TABLE 9.3-4 below shows the approximate results.<sup>24</sup> This is intended as a preview of the types of rate impacts that BEV customers may expect in PG&E’s Next GRC. As described above, moving to full cost of service would result in a large distribution rate increase, but that would be offset by a generation decrease. Please note that the average rate impacts shown below for Direct Access (DA)/Community Choice Aggregation (CCA) customers only reflects the PG&E portion of their bill. Since moving to full cost involves lowering the BEV generation revenue, that change is not reflected on the PG&E portion of the bill for CCA customers. However, if CCAs mirror PG&E’s generation reductions, DA/CCA customers would likely see total bill impacts similar to bundled customers.

<sup>24</sup> See A.19-11-019, Exhibit PG&E-3, Chapters 1 and 2 for more detail on the GRC cost of service study.

<b>Rate Class</b>	<b>Bundled Customers</b>			<b>DA/CCA Customers</b>		
	Revenue at May 1, 2020 Rates (\$000)	Revenue at Full Cost Rates (\$000)	Class Average Percent Change in Revenues	Revenue at May 1, 2020 Rates (\$000)	Revenue at Full Cost Rates (\$000)	Class Average Percent Change in Revenues
Residential	\$3,180,968	\$3,185,672	0.1%	\$2,408,180	\$2,340,778	-2.8%
Small	\$836,190	\$912,255	9.1%	\$861,186	\$995,629	15.6%
Medium	\$734,649	\$685,047	-6.8%	\$787,175	\$785,673	-0.2%
E-19	\$876,221	\$820,868	-6.3%	\$1,092,059	\$1,037,115	-5.0%
Streetlights	\$27,276	\$29,137	6.8%	\$26,097	\$23,849	-8.6%
Standby	\$82,651	\$80,322	-2.8%	\$7,792	\$7,376	-5.3%
Agriculture	\$1,156,635	\$1,271,551	9.9%	\$166,287	\$179,957	8.2%
E-20 T	\$375,754	\$379,351	1.0%	\$189,872	\$192,013	1.1%
E-20 P	\$480,845	\$458,610	-4.6%	\$400,831	\$378,857	-5.5%
E-20 S	\$212,496	\$193,012	-9.2%	\$140,952	\$126,994	-9.9%
BEV	\$7,921	\$7,865	-0.7%	\$15,347	\$19,994	30.3%
System	\$7,971,606	\$8,023,690	0.7%	\$6,095,779	\$6,088,236	-0.1%

*Table 9.3-4 Hypothetical GRC Revenue Allocation*

**Assumptions:**

- Uses PG&E's proposed marginal costs from the 2020 GRC Phase II
- Assumes current BEV population is steady for an entire year
- Assumes the BEV class has no impact to full cost revenues of other classes
- Marginal cost revenues for the BEV class were not as rigorously developed as those for other classes

## 10 Load Management and Grid Integration

Load management is covered in section 9.3, Customer Usage Impact.

## 11 Lessons Learned

### 11.1 Methodology and Objectives

In order to evaluate the customer experience with the BEV rate and explore the level of interest of eligible customers not on a BEV rate, PG&E enlisted a third-party vendor to conduct interviews of participating and non-participating EV customers. Participants were offered a \$125 honorarium (*i.e.*, donation to the charity of their choice) for a 30-minute one-on-one phone interview. A total of 20 customers participated with breakouts by use case in TABLE 11.1-1 below.

Charging Use Case	Total Respondents	BEV Respondents	Non-BEV Respondents <sup>25</sup>
DCFC	2	2	0
Workplace	11	4	7
Fleet (LD, MD)	2	2	0
Transit	2	2	0
MFH	3	2	1

Table 11.1-1 Participants by Use Case

Throughout the interviews, PG&E learned about customers' rate awareness, perceived benefits and challenges on the rate, perceived importance of rates, as well as their preferred approaches to managing charging costs (e.g., via managed charging) among the various use cases. Two main learning outcomes are: (1) BEV rate participants were satisfied with the rate overall, while noting challenges with subscription model management and preference for automatic subscription level adjustment, and (2) non-BEV participants lacked awareness of the BEV rate offering. Additional feedback was to clarify that BEV rate eligibility criteria allows for integration with battery and solar, as long as the solar and/or solar is only connected to EV charging.

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<sup>25</sup> Non-BEV respondents self-identified their use case based on the description provided

## 11.2 Key Learnings from Interviews with BEV Customers

**Rate Awareness:** Most customers learned about the BEV rate through various PG&E channels, including the account representative, construction project manager, and marketing collateral such as emails, letters, and brochures. Additional sources included word-of-mouth among peers, through state agencies such as the California Air Resources board (CARB), as well as enrollment via participation in PG&E's TE infrastructure programs. In particular, and relative to other use case participants, DCFC customers were hyperaware of the rate and enrollment process as they were directly involved in the development of the rate.

**Rate Perceived Benefits:** Those aware of the BEV rate and potential cost savings already planned the switch even before rate was made available, while others made the switch to BEV rate after evaluating their EV charging levels. Customers leveraged a combination of self-service online evaluation tools, custom-developed analysis, and PG&E account representatives as key resources when evaluating the rate. Ultimately, many concluded BEV was the best rate for their organization from a cost perspective and enrolled quickly.

**Rate Challenges:** Managing subscription levels and overages was the main challenge for customers, specifically DCFC participants. While most participants signed up for overage notifications and set up charge limits using available load management software, DCFC participants found the administrative effort to monitor and adjust subscriptions across numerous sites to be a major challenge. The fluctuating nature of public charging, made even more unpredictable with changing COVID restrictions, exacerbated the challenge. An automatically adjusting subscription level was the preferred solution. That said, DCFC respondents were appreciative of the overage fee grace period, possibly more than other use case respondents who tend not to scrutinize and edit subscription levels as frequently.

**Importance of BEV rate:** Electricity costs play a crucial role for DCFC, Medium Duty Fleet and Transit respondents and for these use cases, the BEV rate has proven to be the cost-effective solution for economic viability of EV charging. In contrast, MFH participants, as well as commercial property owners, consider electric rates of the EV chargers to be less important. EV chargers are seen as an amenity to attract tenants and increase property value and charging costs are typically “pass-through” to the tenants.

**Managing Charging Costs:** Most BEV participants are aware of peak pricing and many believe they can adequately manage their energy load using use native charge management software. DCFC and Fleet participants are exceptions as they don't always have the operational flexibility to consistently shift charging – even with automation and load management technologies. Furthermore, interviews revealed that some customers did not have charge management technology but have plans to implement charge management soon. Also of note, most BEV customers have or are in the process of installing photovoltaic (PV) systems. For all customers surveyed, all systems are stand-alone (*e.g.*, not paired with storage) and connected to the main building versus the EV chargers.

In terms of future investments, larger organizations are expanding charging station capabilities in response to California's mandates. Smaller workplace and MFH/commercial property respondents seem

content with their current EV infrastructure, but several are open to additional installations in the future.

### 11.3 Key Learnings from Interviews with Non-BEV Customers

**Rate Awareness:** Unlike participants on the BEV rate, there is a low level of awareness of the BEV Rate amongst non-participants. Even those who are aware of the BEV Rate have no familiarity with specifics, such as subscription rates, grace periods or overage notifications.

**Rate Perceived Benefits:** Many participants are still on the rate initially selected when chargers were first installed, and they believe the current plan is adequate. While many say they look to PG&E for guidance on selecting the best EV rates, respondents did not utilize online PG&E tools when electing their rate plan.

**Importance of BEV Rate:** While electric rates, in general, are important for Non-BEV participants, rates related to EV charging are a lower priority. Especially for MFH and Workplace participants where costs are typically the responsibility of end-users, setting an adequate “pass-through” charging rate is the top concern. Therefore, while a few non-BEV participants do closely monitor their EV charging rates beyond just checking their monthly PG&E bill, a majority are indifferent about the peak period or load management as it related to EV charging.

**Managing Charging Costs:** Compared to BEV customers, fewer non-BEV customers use charge management software to manage and optimize charging. Most participants either do not see a big impact with peak pricing or have not performed analysis so there is less incentive to pay for and leverage charge management solutions.

### 11.4 EV Charging Pricing Offered by BEV Customers

As EV charging entities do not publish or share EV charging pricing information widely, PG&E reached out to BEV customers who participated in the interview to gather information on pricing and TOU signaling, charging costs, and charger type. Based on the responses below in TABLE 11.4-1, pricing varies greatly. Most surveyed customers adhere to PG&E’s TOU times and either offer “pass-through” pricing or offer higher prices than PG&E rates. This is not a representative sample due to the small number of responses and only points to potential trends for these type of customers.

Pricing and TOU Signaling by BEV Customer	EV Charging Cost	EV Charging Type
Offers Pass-Through PG&E Rates and abides by PG&E TOU times	\$0.11 to \$0.33/kWh	MFH, Workplace
Offers higher than PG&E rates and abides by PG&E TOU times	\$0.31/kWh to \$0.85/kWh	DCFC, MFH
Offers a Flat Charge 24/7	\$0.45/kWh	MFH

Table 11.4-1 EV Charging Pricing

## 11.5 Next Steps and Considerations

PG&E continues to gather and review customer feedback and is looking at future ways to support commercial EV customers through the following opportunities:

### 11.5.1 ME&O Opportunities

- Additional targeted marketing focusing on PG&E rate offerings can better support customers who are a good candidate for the BEV rate.
- Continue to message BEV rate to customers who are considering EV charger installation.
- Leverage account representatives and their role as an ideal and trusted resource to promote BEV rate.
- Continued education around how to access and use rate tools on PG&E's website.

### 11.5.2 BEV Rate Improvement Opportunities

- Evaluate the feasibility of automatically adjusting subscription elections for customers with numerous charging sites rather than requiring customers to make manual changes.
- Streamline the process for editing subscription elections, such as adjusting levels for multiple sites at once.
- Include specific site information in overage fee notifications, with the full street address of the site.
- Explore defaulting all new EV customers into a BEV rate.

### 11.5.3 Infrastructure Opportunities:

- Work closely with customers to help them understand how to design and install EV infrastructure that is eligible for the BEV rate.
- Become a trusted resource for information on financial assistance opportunities, especially for customers who are obligated to adopt zero emissions vehicles via state mandate.

## 12 EV Adoption and Environmental Benefits

This section of the SB 350 template for program reporting is not applicable for the BEV Rate performance report.

# **Attachment 2**

## Data Report

### Attachment 2 Notes:

Per D.19-10-055 ordering paragraph (OP)16[1], PG&E is required to submit an annual, information-only, Tier 1 Advice Letter containing a report on BEV rate performance leveraging SB 350 template[2]. SB 350 reporting template was designed for program reporting, where some elements do not apply to BEV rate performance reporting. The PG&E adopted the template without making any changes to the format and simply omit data that don't apply to BEV rate performance reporting for consistency with other SB 350 reporting efforts. The following clarifications flag any potential data labeling issues associated with load data reporting in this attachment.

- Utility Program (Column B) is adopted to break data by rates: BEV1 vs. BEV2. Due to the low enrollment rate for the Fleet and Transit customers, the Load Data was not broken down by the use case due to customer data privacy limitations. As the adoption increases, additional data points would allow for more granularity in the next year's report.

- Count of EVSE energized (Column G) data is not available. Unlike with other Transportation Electrification programs, PG&E does not collect individual EV charger information for customers who enroll on a BEV rate.

- Count of Sites using utility meter data (Column H) is adopted from SB 350 template to reflect the number of EV Service Point IDs (SPID), which are the points at which energy is metered by PG&E. The count reflects all SPIDs that were active at any point during calendar year 2021. SPID is a more granular definition of customer site than the Service Agreement ID (SAID), as there could be multiple SPIDs associated with a single SAID. There might be multiple EVSEs associated with a single SPID. The narrative portion of the report uses SAID definition of the customer site as it is tied to a single customer address.

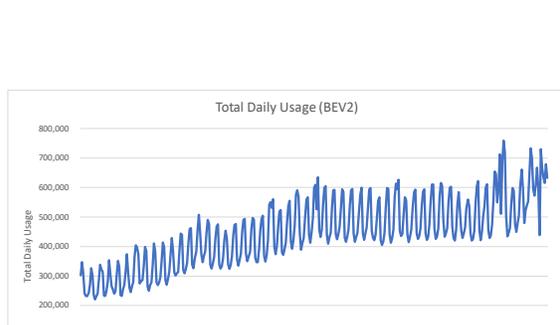
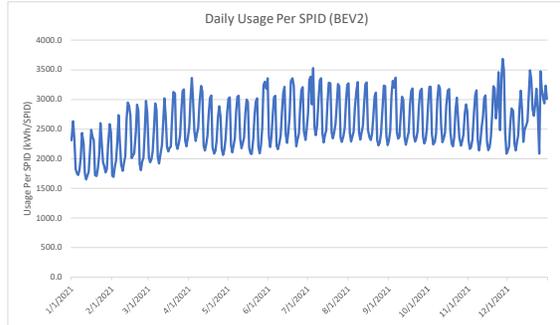
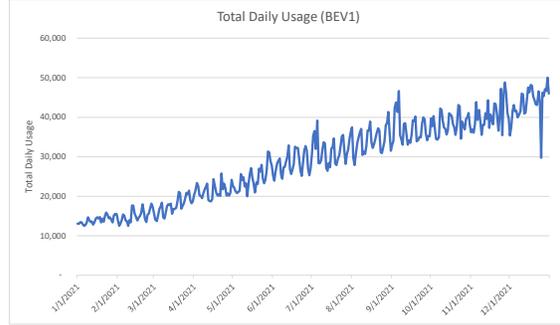
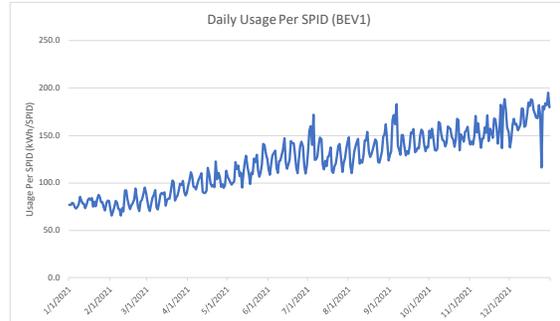
- Count of Sites using third party meter data (Column I) PG&E does not have information available about third-party metering for customers on BEV rate.

[1] DECISION APPROVING APPLICATION FOR PACIFIC GAS AND ELECTRIC COMPANY'S COMMERCIAL ELECTRIC VEHICLE RATES  
<https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M318/K552/318552527.PDF> Chapter 7, page 61.

[2] <https://www.cpuc.ca.gov/industries-and-topics/electrical-energy/infrastructure/transportation-electrification/transportation-electrification-activities-pursuant-to-senate-bill-350>



Reporting Date	Utility Program	Market sectors covered	Usage Date	kWh Consumed	Number of SPIDs	kWh Per SPID
2021-04-01	BEV1	All	1/1/2021	13,051	169	77.2
2021-04-01	BEV1	All	1/2/2021	13,079	170	76.9
2021-04-01	BEV1	All	1/3/2021	13,451	170	79.1
2021-04-01	BEV1	All	1/4/2021	13,403	171	78.4
2021-04-01	BEV1	All	1/5/2021	12,801	171	74.9
2021-04-01	BEV1	All	1/6/2021	12,498	171	73.1
2021-04-01	BEV1	All	1/7/2021	12,738	171	74.4
2021-04-01	BEV1	All	1/8/2021	13,392	172	77.9
2021-04-01	BEV1	All	1/9/2021	14,689	172	85.4
2021-04-01	BEV1	All	1/10/2021	14,001	172	81.4
2021-04-01	BEV1	All	1/11/2021	13,476	172	78.3
2021-04-01	BEV1	All	1/12/2021	13,647	175	78.0
2021-04-01	BEV1	All	1/13/2021	12,847	175	73.4
2021-04-01	BEV1	All	1/14/2021	13,439	175	76.8
2021-04-01	BEV1	All	1/15/2021	14,454	175	82.6
2021-04-01	BEV1	All	1/16/2021	14,685	175	83.9
2021-04-01	BEV1	All	1/17/2021	14,350	175	82.0
2021-04-01	BEV1	All	1/18/2021	14,731	175	84.2
2021-04-01	BEV1	All	1/19/2021	13,369	178	75.1
2021-04-01	BEV1	All	1/20/2021	14,337	178	80.5
2021-04-01	BEV1	All	1/21/2021	13,579	180	75.4
2021-04-01	BEV1	All	1/22/2021	15,021	181	83.0
2021-04-01	BEV1	All	1/23/2021	15,868	181	87.7
2021-04-01	BEV1	All	1/24/2021	15,407	181	85.1
2021-04-01	BEV1	All	1/25/2021	14,470	181	79.9
2021-04-01	BEV1	All	1/26/2021	14,656	184	79.7
2021-04-01	BEV1	All	1/27/2021	14,080	188	74.9
2021-04-01	BEV1	All	1/28/2021	13,366	188	71.1
2021-04-01	BEV1	All	1/29/2021	15,140	191	79.3
2021-04-01	BEV1	All	1/30/2021	15,559	191	81.5
2021-04-01	BEV1	All	1/31/2021	15,468	191	81.0
2021-04-01	BEV1	All	2/1/2021	13,841	190	72.8
2021-04-01	BEV1	All	2/2/2021	12,492	190	65.7
2021-04-01	BEV1	All	2/3/2021	13,191	190	69.4
2021-04-01	BEV1	All	2/4/2021	14,048	190	73.9
2021-04-01	BEV1	All	2/5/2021	15,411	190	81.1
2021-04-01	BEV1	All	2/6/2021	15,118	190	79.6
2021-04-01	BEV1	All	2/7/2021	13,898	190	73.2
2021-04-01	BEV1	All	2/8/2021	17,713	190	93.2
2021-04-01	BEV1	All	2/9/2021	12,474	190	65.7
2021-04-01	BEV1	All	2/10/2021	13,941	190	73.4
2021-04-01	BEV1	All	2/11/2021	13,377	191	70.0
2021-04-01	BEV1	All	2/12/2021	17,630	191	92.3
2021-04-01	BEV1	All	2/13/2021	17,639	191	92.3
2021-04-01	BEV1	All	2/14/2021	15,735	191	82.4
2021-04-01	BEV1	All	2/15/2021	14,653	191	76.7
2021-04-01	BEV1	All	2/16/2021	13,859	191	72.6
2021-04-01	BEV1	All	2/17/2021	14,587	191	76.4
2021-04-01	BEV1	All	2/18/2021	15,011	191	78.6
2021-04-01	BEV1	All	2/19/2021	15,843	191	82.9
2021-04-01	BEV1	All	2/20/2021	18,023	191	94.4
2021-04-01	BEV1	All	2/21/2021	16,180	191	84.7
2021-04-01	BEV1	All	2/22/2021	14,203	191	74.4
2021-04-01	BEV1	All	2/23/2021	13,445	191	70.4
2021-04-01	BEV1	All	2/24/2021	15,353	191	80.4
2021-04-01	BEV1	All	2/25/2021	15,658	191	82.0
2021-04-01	BEV1	All	2/26/2021	16,933	191	88.7
2021-04-01	BEV1	All	2/27/2021	18,162	191	95.1
2021-04-01	BEV1	All	2/28/2021	17,333	192	90.3
2021-04-01	BEV1	All	3/1/2021	15,731	192	81.9
2021-04-01	BEV1	All	3/2/2021	14,144	191	74.1
2021-04-01	BEV1	All	3/3/2021	13,728	195	70.4
2021-04-01	BEV1	All	3/4/2021	15,164	196	77.4
2021-04-01	BEV1	All	3/5/2021	16,761	199	84.2
2021-04-01	BEV1	All	3/6/2021	17,459	199	87.7
2021-04-01	BEV1	All	3/7/2021	18,388	199	92.4
2021-04-01	BEV1	All	3/8/2021	14,729	198	74.4
2021-04-01	BEV1	All	3/9/2021	14,371	199	72.2
2021-04-01	BEV1	All	3/10/2021	15,785	200	78.9
2021-04-01	BEV1	All	3/11/2021	17,528	200	87.6
2021-04-01	BEV1	All	3/12/2021	17,977	201	89.4
2021-04-01	BEV1	All	3/13/2021	17,719	201	88.2
2021-04-01	BEV1	All	3/14/2021	18,139	201	90.2
2021-04-01	BEV1	All	3/15/2021	15,539	204	76.2
2021-04-01	BEV1	All	3/16/2021	16,762	204	82.2
2021-04-01	BEV1	All	3/17/2021	16,787	201	83.5
2021-04-01	BEV1	All	3/18/2021	17,140	205	83.6
2021-04-01	BEV1	All	3/19/2021	18,759	205	91.5
2021-04-01	BEV1	All	3/20/2021	21,120	206	102.5
2021-04-01	BEV1	All	3/21/2021	20,797	206	101.0
2021-04-01	BEV1	All	3/22/2021	16,855	207	81.4
2021-04-01	BEV1	All	3/23/2021	17,627	208	84.7
2021-04-01	BEV1	All	3/24/2021	18,231	210	86.8
2021-04-01	BEV1	All	3/25/2021	19,425	210	92.5
2021-04-01	BEV1	All	3/26/2021	20,863	210	99.3
2021-04-01	BEV1	All	3/27/2021	20,457	209	97.9
2021-04-01	BEV1	All	3/28/2021	21,451	210	102.1
2021-04-01	BEV1	All	3/29/2021	19,075	210	90.8
2021-04-01	BEV1	All	3/30/2021	18,230	210	86.8
2021-04-01	BEV1	All	3/31/2021	18,733	210	89.2
2021-04-01	BEV1	All	4/1/2021	20,302	210	96.7
2021-04-01	BEV1	All	4/2/2021	21,407	210	101.9
2021-04-01	BEV1	All	4/3/2021	23,361	210	111.2
2021-04-01	BEV1	All	4/4/2021	22,545	210	107.4
2021-04-01	BEV1	All	4/5/2021	20,215	210	96.3
2021-04-01	BEV1	All	4/6/2021	20,094	210	95.7
2021-04-01	BEV1	All	4/7/2021	19,559	210	93.1
2021-04-01	BEV1	All	4/8/2021	20,711	210	98.6
2021-04-01	BEV1	All	4/9/2021	21,715	210	103.4
2021-04-01	BEV1	All	4/10/2021	22,430	210	106.8
2021-04-01	BEV1	All	4/11/2021	23,188	210	110.4
2021-04-01	BEV1	All	4/12/2021	19,011	210	90.5
2021-04-01	BEV1	All	4/13/2021	18,828	210	89.7
2021-04-01	BEV1	All	4/14/2021	18,678	209	89.4
2021-04-01	BEV1	All	4/15/2021	19,290	210	91.9
2021-04-01	BEV1	All	4/16/2021	24,387	210	116.1
2021-04-01	BEV1	All	4/17/2021	22,753	210	108.3
2021-04-01	BEV1	All	4/18/2021	20,845	210	99.3
2021-04-01	BEV1	All	4/19/2021	20,189	210	96.1
2021-04-01	BEV1	All	4/20/2021	20,565	210	97.9
2021-04-01	BEV1	All	4/21/2021	20,097	210	95.7
2021-04-01	BEV1	All	4/22/2021	25,783	210	122.8
2021-04-01	BEV1	All	4/23/2021	21,804	210	103.8
2021-04-01	BEV1	All	4/24/2021	23,217	210	110.6
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2021-04-01	BEV1	All	4/26/2021	20,132	210	95.9
2021-04-01	BEV1	All	4/27/2021	20,758	210	98.8
2021-04-01	BEV1	All	4/28/2021	20,148	212	95.0
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2021-04-01	BEV1	All	4/30/2021	24,193	214	113.1
2021-04-01	BEV1	All	5/1/2021	22,686	214	106.0
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2021-04-01	BEV1	All	5/6/2021	21,360	210	101.7
2021-04-01	BEV1	All	5/7/2021	25,623	210	122.0
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2021-04-01	BEV1	All	5/9/2021	24,846	210	118.3
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2021-04-01	BEV1	All	5/29/2021	31,121	222	140.2
2021-04-01	BEV1	All	5/30/2021	28,849	222	130.0
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2021-04-01	BEV1	All	6/9/2021	27,310	222	123.0
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2021-04-01	BEV1	All	6/11/2021	28,855	223	129.4
2021-04-01	BEV1	All	6/12/2021	30,087	223	134.9
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2021-04-01	BEV1	All	6/14/2021	26,963	223	120.9
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2021-04-01	BEV1	All	6/16/2021	26,797	224	119.6
2021-04-01	BEV1	All	6/17/2021	28,101	226	124.3
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2021-04-01	BEV1	All	6/19/2021	32,267	227	142.1
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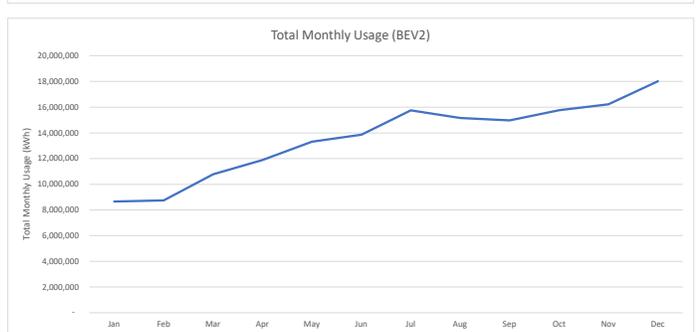
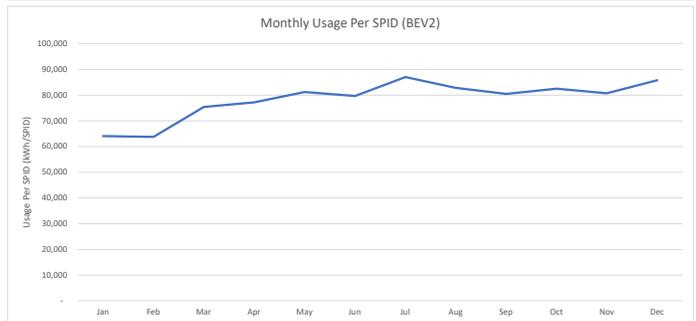
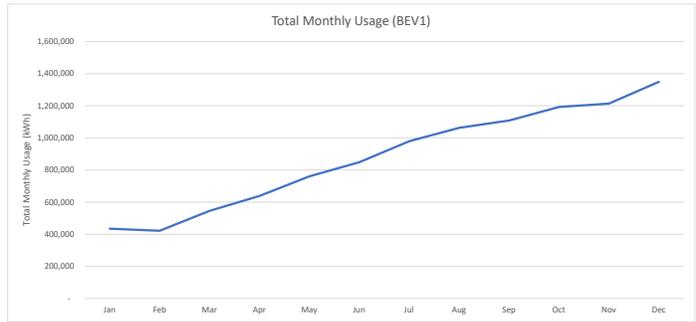
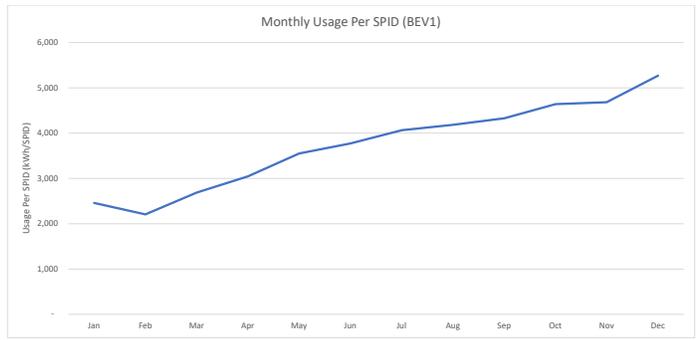
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2021-04-01	BEV2	All	1/1/2021	303,102	131	2313.8
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2021-04-01	BEV2	All	1/3/2021	309,086	132	2341.6
2021-04-01	BEV2	All	1/4/2021	241,336	132	1828.3
2021-04-01	BEV2	All	1/5/2021	232,237	132	1759.4
2021-04-01	BEV2	All	1/6/2021	231,383	134	1726.7
2021-04-01	BEV2	All	1/7/2021	242,257	134	1807.9
2021-04-01	BEV2	All	1/8/2021	270,367	134	2017.7
2021-04-01	BEV2	All	1/9/2021	326,286	134	2435.0
2021-04-01	BEV2	All	1/10/2021	302,809	134	2259.8
2021-04-01	BEV2	All	1/11/2021	235,190	134	1755.1
2021-04-01	BEV2	All	1/12/2021	220,941	134	1648.8
2021-04-01	BEV2	All	1/13/2021	231,216	135	1712.7
2021-04-01	BEV2	All	1/14/2021	240,507	135	1781.5
2021-04-01	BEV2	All	1/15/2021	287,600	135	2130.4
2021-04-01	BEV2	All	1/16/2021	338,196	136	2486.7
2021-04-01	BEV2	All	1/17/2021	322,689	136	2372.7
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2021-04-01	BEV2	All	2/1/2021	235,288	137	1717.4
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2021-04-01	BEV2	All	2/18/2021	286,118	137	2088.5
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2021-04-01	BEV2	All	8/24/2021	404,907	182	2224.8
2021-04-01	BEV2	All	8/25/2021	415,862	183	2272.5
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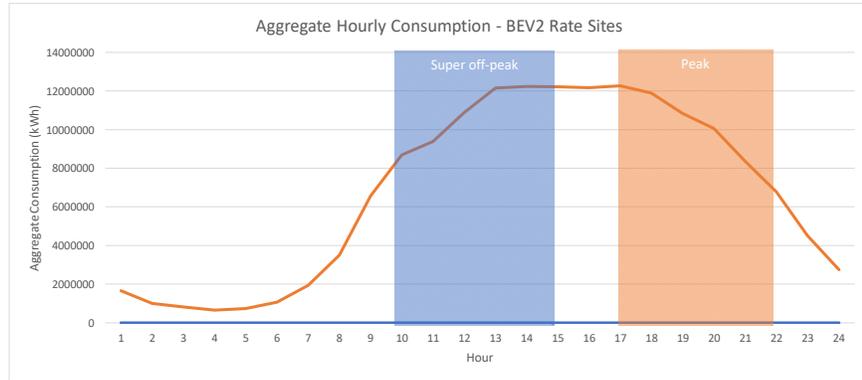
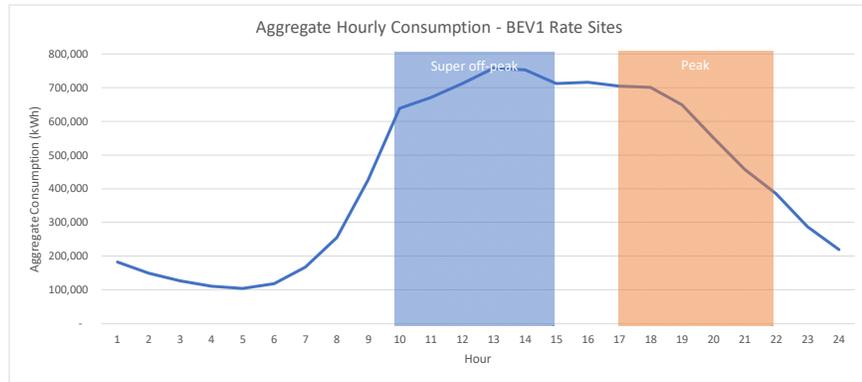
2021-04-01	BEV2	All	8/27/2021	531,559	185	2873.3
2021-04-01	BEV2	All	8/28/2021	598,058	185	3232.7
2021-04-01	BEV2	All	8/29/2021	596,364	185	3223.6
2021-04-01	BEV2	All	8/30/2021	440,517	185	2381.2
2021-04-01	BEV2	All	8/31/2021	413,148	185	2233.2
2021-04-01	BEV2	All	9/1/2021	427,991	185	2313.5
2021-04-01	BEV2	All	9/2/2021	457,453	185	2472.7
2021-04-01	BEV2	All	9/3/2021	568,436	185	3072.6
2021-04-01	BEV2	All	9/4/2021	613,066	185	3313.9
2021-04-01	BEV2	All	9/5/2021	595,162	186	3199.8
2021-04-01	BEV2	All	9/6/2021	626,885	186	3370.4
2021-04-01	BEV2	All	9/7/2021	453,608	186	2438.8
2021-04-01	BEV2	All	9/8/2021	434,997	186	2338.7
2021-04-01	BEV2	All	9/9/2021	442,160	186	2377.2
2021-04-01	BEV2	All	9/10/2021	507,183	186	2726.8
2021-04-01	BEV2	All	9/11/2021	566,744	186	3047.0
2021-04-01	BEV2	All	9/12/2021	555,959	186	2989.0
2021-04-01	BEV2	All	9/13/2021	439,607	186	2363.5
2021-04-01	BEV2	All	9/14/2021	415,468	186	2233.7
2021-04-01	BEV2	All	9/15/2021	433,471	186	2330.5
2021-04-01	BEV2	All	9/16/2021	455,668	186	2449.8
2021-04-01	BEV2	All	9/17/2021	539,504	186	2900.6
2021-04-01	BEV2	All	9/18/2021	584,220	186	3141.0
2021-04-01	BEV2	All	9/19/2021	599,096	186	3188.7
2021-04-01	BEV2	All	9/20/2021	445,684	186	2396.1
2021-04-01	BEV2	All	9/21/2021	425,473	186	2287.5
2021-04-01	BEV2	All	9/22/2021	435,792	186	2343.0
2021-04-01	BEV2	All	9/23/2021	460,858	187	2464.5
2021-04-01	BEV2	All	9/24/2021	537,142	187	2872.4
2021-04-01	BEV2	All	9/25/2021	586,570	187	3136.7
2021-04-01	BEV2	All	9/26/2021	594,357	187	3178.4
2021-04-01	BEV2	All	9/27/2021	444,526	187	2377.1
2021-04-01	BEV2	All	9/28/2021	422,374	187	2258.7
2021-04-01	BEV2	All	9/29/2021	432,752	187	2314.2
2021-04-01	BEV2	All	9/30/2021	474,488	190	2497.3
2021-04-01	BEV2	All	10/1/2021	553,678	190	2914.1
2021-04-01	BEV2	All	10/2/2021	610,507	190	3213.2
2021-04-01	BEV2	All	10/3/2021	610,413	190	3212.7
2021-04-01	BEV2	All	10/4/2021	458,938	190	2415.5
2021-04-01	BEV2	All	10/5/2021	426,097	190	2242.6
2021-04-01	BEV2	All	10/6/2021	434,016	190	2284.3
2021-04-01	BEV2	All	10/7/2021	461,423	190	2428.5
2021-04-01	BEV2	All	10/8/2021	569,359	190	2996.6
2021-04-01	BEV2	All	10/9/2021	615,532	190	3239.6
2021-04-01	BEV2	All	10/10/2021	605,699	190	3187.9
2021-04-01	BEV2	All	10/11/2021	484,951	190	2552.4
2021-04-01	BEV2	All	10/12/2021	432,834	190	2278.1
2021-04-01	BEV2	All	10/13/2021	445,307	190	2343.7
2021-04-01	BEV2	All	10/14/2021	462,129	190	2432.3
2021-04-01	BEV2	All	10/15/2021	551,135	190	2900.7
2021-04-01	BEV2	All	10/16/2021	599,384	190	3154.7
2021-04-01	BEV2	All	10/17/2021	603,005	190	3173.7
2021-04-01	BEV2	All	10/18/2021	465,262	190	2448.7
2021-04-01	BEV2	All	10/19/2021	428,210	190	2253.7
2021-04-01	BEV2	All	10/20/2021	420,019	190	2210.6
2021-04-01	BEV2	All	10/21/2021	456,771	193	2366.7
2021-04-01	BEV2	All	10/22/2021	542,985	193	2813.4
2021-04-01	BEV2	All	10/23/2021	594,819	193	3030.2
2021-04-01	BEV2	All	10/24/2021	515,728	193	2692.9
2021-04-01	BEV2	All	10/25/2021	455,126	193	2358.2
2021-04-01	BEV2	All	10/26/2021	428,573	193	2220.6
2021-04-01	BEV2	All	10/27/2021	443,620	193	2298.5
2021-04-01	BEV2	All	10/28/2021	464,763	193	2408.1
2021-04-01	BEV2	All	10/29/2021	529,627	192	2758.5
2021-04-01	BEV2	All	10/30/2021	560,044	192	2916.9
2021-04-01	BEV2	All	10/31/2021	537,455	192	2799.2
2021-04-01	BEV2	All	11/1/2021	445,854	193	2310.1
2021-04-01	BEV2	All	11/2/2021	420,395	194	2167.0
2021-04-01	BEV2	All	11/3/2021	426,234	194	2197.1
2021-04-01	BEV2	All	11/4/2021	452,960	195	2322.9
2021-04-01	BEV2	All	11/5/2021	546,925	197	2776.3
2021-04-01	BEV2	All	11/6/2021	605,090	197	3071.5
2021-04-01	BEV2	All	11/7/2021	621,634	197	3155.5
2021-04-01	BEV2	All	11/8/2021	455,188	197	2310.6
2021-04-01	BEV2	All	11/9/2021	420,989	197	2137.0
2021-04-01	BEV2	All	11/10/2021	450,446	197	2286.5
2021-04-01	BEV2	All	11/11/2021	503,179	199	2528.5
2021-04-01	BEV2	All	11/12/2021	537,254	199	2699.8
2021-04-01	BEV2	All	11/13/2021	600,781	199	3019.0
2021-04-01	BEV2	All	11/14/2021	611,048	199	3070.6
2021-04-01	BEV2	All	11/15/2021	455,443	200	2277.2
2021-04-01	BEV2	All	11/16/2021	429,103	200	2145.5
2021-04-01	BEV2	All	11/17/2021	438,615	200	2193.1
2021-04-01	BEV2	All	11/18/2021	476,606	202	2359.4
2021-04-01	BEV2	All	11/19/2021	555,755	203	2737.7
2021-04-01	BEV2	All	11/20/2021	654,379	203	3223.5
2021-04-01	BEV2	All	11/21/2021	645,542	203	3180.0
2021-04-01	BEV2	All	11/22/2021	550,177	205	2683.8
2021-04-01	BEV2	All	11/23/2021	594,328	206	2885.1
2021-04-01	BEV2	All	11/24/2021	712,651	206	3459.5
2021-04-01	BEV2	All	11/25/2021	511,003	206	2480.6
2021-04-01	BEV2	All	11/26/2021	686,815	206	3334.1
2021-04-01	BEV2	All	11/27/2021	758,310	206	3681.1
2021-04-01	BEV2	All	11/28/2021	720,703	206	3498.6
2021-04-01	BEV2	All	11/29/2021	501,897	206	2436.4
2021-04-01	BEV2	All	11/30/2021	434,282	208	2087.9
2021-04-01	BEV2	All	12/1/2021	446,077	209	2134.3
2021-04-01	BEV2	All	12/2/2021	462,482	210	2202.3
2021-04-01	BEV2	All	12/3/2021	542,820	210	2584.9
2021-04-01	BEV2	All	12/4/2021	598,057	210	2847.9
2021-04-01	BEV2	All	12/5/2021	588,633	210	2803.0
2021-04-01	BEV2	All	12/6/2021	475,668	210	2265.1
2021-04-01	BEV2	All	12/7/2021	449,442	210	2140.2
2021-04-01	BEV2	All	12/8/2021	478,385	210	2278.0
2021-04-01	BEV2	All	12/9/2021	503,989	210	2399.9
2021-04-01	BEV2	All	12/10/2021	601,443	210	2864.0
2021-04-01	BEV2	All	12/11/2021	661,176	210	3148.5
2021-04-01	BEV2	All	12/12/2021	592,557	210	2821.7
2021-04-01	BEV2	All	12/13/2021	479,666	210	2284.1
2021-04-01	BEV2	All	12/14/2021	523,078	210	2490.8
2021-04-01	BEV2	All	12/15/2021	538,638	210	2564.9
2021-04-01	BEV2	All	12/16/2021	553,426	210	2635.4
2021-04-01	BEV2	All	12/17/2021	644,141	210	3067.3
2021-04-01	BEV2	All	12/18/2021	732,967	210	3490.3
2021-04-01	BEV2	All	12/19/2021	701,048	210	3338.3
2021-04-01	BEV2	All	12/20/2021	595,609	210	2836.2
2021-04-01	BEV2	All	12/21/2021	572,420	210	2725.8
2021-04-01	BEV2	All	12/22/2021	609,352	210	2901.7
2021-04-01	BEV2	All	12/23/2021	667,514	210	3178.6
2021-04-01	BEV2	All	12/24/2021	597,834	210	2846.8
2021-04-01	BEV2	All	12/25/2021	438,450	210	2087.9

2021-04-01	BEV2	All	12/26/2021	729,865	210	3475.5
2021-04-01	BEV2	All	12/27/2021	666,044	210	3171.6
2021-04-01	BEV2	All	12/28/2021	635,285	210	3025.2
2021-04-01	BEV2	All	12/29/2021	615,960	210	2933.1
2021-04-01	BEV2	All	12/30/2021	679,670	210	3236.5
2021-04-01	BEV2	All	12/31/2021	632,384	210	3011.4

Reporting Date	Utility Program	Market sectors covered	Usage Month	kWh Consumed	Average Number of SPID	kWh Per SPID
2021-04-01	BEV1	All	Jan	435,040	177	2,458
2021-04-01	BEV1	All	Feb	421,750	191	2,208
2021-04-01	BEV1	All	Mar	545,465	203	2,687
2021-04-01	BEV1	All	Apr	639,333	210	3,044
2021-04-01	BEV1	All	May	760,222	214	3,553
2021-04-01	BEV1	All	Jun	848,585	225	3,771
2021-04-01	BEV1	All	Jul	979,458	241	4,064
2021-04-01	BEV1	All	Aug	1,062,326	254	4,182
2021-04-01	BEV1	All	Sep	1,108,002	256	4,328
2021-04-01	BEV1	All	Oct	1,192,419	257	4,640
2021-04-01	BEV1	All	Nov	1,213,174	259	4,684
2021-04-01	BEV1	All	Dec	1,348,879	256	5,269
2021-04-01	BEV2	All	Jan	8,652,732	135	64,094
2021-04-01	BEV2	All	Feb	8,736,826	137	63,772
2021-04-01	BEV2	All	Mar	10,782,976	143	75,405
2021-04-01	BEV2	All	Apr	11,887,484	154	77,191
2021-04-01	BEV2	All	May	13,317,130	164	81,202
2021-04-01	BEV2	All	Jun	13,858,946	174	79,649
2021-04-01	BEV2	All	Jul	15,748,100	181	87,006
2021-04-01	BEV2	All	Aug	15,158,483	183	82,833
2021-04-01	BEV2	All	Sep	14,970,695	186	80,488
2021-04-01	BEV2	All	Oct	15,761,409	191	82,520
2021-04-01	BEV2	All	Nov	16,223,587	201	80,714
2021-04-01	BEV2	All	Dec	18,014,083	210	85,781



Utility Program	Hour	TOU Period	Aggregate Consumption (kWh)
BEV1	1	Off-peak	182,425
BEV1	2	Off-peak	149,367
BEV1	3	Off-peak	127,049
BEV1	4	Off-peak	110,830
BEV1	5	Off-peak	104,571
BEV1	6	Off-peak	118,302
BEV1	7	Off-peak	167,430
BEV1	8	Off-peak	255,595
BEV1	9	Off-peak	426,296
BEV1	10	Super off-peak	638,498
BEV1	11	Super off-peak	670,942
BEV1	12	Super off-peak	711,840
BEV1	13	Super off-peak	757,877
BEV1	14	Super off-peak	752,393
BEV1	15	Off-peak	712,082
BEV1	16	Off-peak	715,362
BEV1	17	Peak	704,704
BEV1	18	Peak	700,459
BEV1	19	Peak	648,463
BEV1	20	Peak	551,571
BEV1	21	Peak	457,623
BEV1	22	Off-peak	385,065
BEV1	23	Off-peak	287,145
BEV1	24	Off-peak	218,865
BEV2	1	Off-peak	1,657,616
BEV2	2	Off-peak	998,568
BEV2	3	Off-peak	822,176
BEV2	4	Off-peak	661,596
BEV2	5	Off-peak	730,420
BEV2	6	Off-peak	1,071,997
BEV2	7	Off-peak	1,934,651
BEV2	8	Off-peak	3,503,573
BEV2	9	Off-peak	6,566,817
BEV2	10	Super off-peak	8,691,150
BEV2	11	Super off-peak	9,385,163
BEV2	12	Super off-peak	10,883,495
BEV2	13	Super off-peak	12,147,413
BEV2	14	Super off-peak	12,227,437
BEV2	15	Off-peak	12,215,368
BEV2	16	Off-peak	12,167,666
BEV2	17	Peak	12,276,276
BEV2	18	Peak	11,895,695
BEV2	19	Peak	10,834,643
BEV2	20	Peak	10,057,124
BEV2	21	Peak	8,357,066
BEV2	22	Off-peak	6,782,542
BEV2	23	Off-peak	4,503,260
BEV2	24	Off-peak	2,740,740



**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  
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  
Uplight  
Water and Energy Consulting Wellhead  
Electric Company  
Western Manufactured Housing  
Communities Association (WMA)  
Yep Energy