

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



Pacific Gas & Electric Company
ELC (Corp ID 39)
Status of Advice Letter 6835E
As of November 21, 2023

Subject: PG&E's Proposal Pursuant to OP 20 of D. 22-12-054: How to Evaluate When Deployment of Below 100 kW DCFCs is Appropriate

Division Assigned: Energy

Date Filed: 01-18-2023

Date to Calendar: 01-27-2023

Authorizing Documents: D2212054

Disposition:	Withdrawn
Effective Date:	None

Resolution Required: No

Resolution Number: None

Commission Meeting Date: None

CPUC Contact Information:

edtariffunit@cpuc.ca.gov

AL Certificate Contact Information:

Kimberly Loo

(415)973-4587

PGETariffs@pge.com

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



To: Energy Company Filing Advice Letter

From: Energy Division PAL Coordinator

Subject: Your Advice Letter Filing

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

The AL status certificate indicates:

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- Disposition of Filing (Accepted, Rejected, Withdrawn, etc.)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

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

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

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



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

Fax: 415-973-3582

January 18, 2023

Advice 6835-E

(Pacific Gas and Electric Company ID U 39 E)

Public Utilities Commission of the State of California

Subject: PG&E's Proposal Pursuant to OP 20 of D. 22-12-054: How to Evaluate When Deployment of Below 100 kW DCFCs is Appropriate

Purpose

Pursuant to Ordering Paragraph (OP) 20 of California Public Utilities Commission (CPUC or Commission) Decision (D.) 22-12-054, Pacific Gas and Electric Company (PG&E) hereby submits, and requests approval of this Tier 2 Advice Letter proposing how to evaluate when deployment of below 100 kilowatt (kW) DCFCs is appropriate.

Background

PG&E filed Application (A.) 21-10-010 on October 26, 2021, seeking authorization to implement the Electric Vehicle Charge 2 (EVC 2) program using ratepayer funding to support the installation of electric vehicle (EV) charging infrastructure. The application proposed the installation of approximately 16,000 Level 2 (L2) and Direct Current Fast Charger (DCFC) ports.

D.22-12-054, issued on December 19, 2022, approved funding for PG&E to implement phase 1 of the EVC 2 program, including the installation of 187 DCFC ports. OP 20 of the decision directed that PG&E shall support higher DCFC capacities (i.e., 100 kW and higher) in EVC 2, and that PG&E may support lower charging capacities (i.e., below 100 kW) when reasonable. OP 20 also directed PG&E to submit a Tier 2 advice letter proposing how to evaluate when deployment of below 100 kW DCFCs is appropriate.

Discussion

A.21-10-010 proposed, and D.22-12-054 approved, that PG&E will cover 90 percent, up to \$67,000, of the cost of the behind-the-meter (BTM) make-ready costs associated with DCFC installations. EVC 2 will not cover the to-the-meter or electric vehicle service equipment (EVSE) costs associated with participating DCFC installations. PG&E does not have data to indicate that there is a meaningful difference in BTM make-ready costs

between installations with lower DCFC capacities and those with higher DCFC capacities. Given these circumstances, PG&E did not propose a tiered incentive for DCFC projects according to their power levels.

However, PG&E understands that there is indeed a cost difference between lower and higher power DCFC EVSE. As such, without further action, PG&E may be inadvertently disincentivizing applications with higher DCFC capacities in EVC 2.

To ensure support of 100 kW+ DCFC charger capacities in EVC 2, all else equal,¹ PG&E will prioritize applications according to their power level. However, as a general matter, PG&E does not want to arbitrarily limit customers from right sizing their infrastructure. Customers for whom <100 kW chargers are appropriate will still qualify for EVC 2, provided that their applications certify they meet the following criteria:

- Customer would not install infrastructure if they can't install chargers of under 100 kW.
- All applicants will be asked in the application process to explain why they have selected their given power levels. Acceptable reasons why <100 kW chargers are appropriate may include, but are not limited to, locations where drivers have a >30-minute dwell time or real estate-constrained locations where higher-powered equipment cannot fit.

PG&E could also consider increasing its per-port BTM make-ready incentive for higher powered DCFC installations. If the CPUC would like PG&E to offer such a tiered incentive, PG&E requests the CPUC direct the Utility to file an Advice Letter to outline these updated incentives and the associated incremental budget request.

Protests

Anyone wishing to protest this submittal may do so by letter sent electronically via E-mail, no later than February 7, 2023, 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:

¹ As stated in A.21-10-010, PG&E will use a range of information to evaluate EVC 2 sites (PGE-01, 4-5).



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) #: 6835-E

Tier Designation: 2

Subject of AL: PG&E's Proposal Pursuant to OP 20 of D. 22-12-054: How to Evaluate When Deployment of Below 100 kW DCFCs is Appropriate

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. 22-12-054

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: 2/17/23

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 Blaising 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
Dish Wireless L.L.C.

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

iCommLaw
International Power Technology
Intertie

Intestate Gas Services, Inc.

Johnston, Kevin
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.

Resource Innovations

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
Stoel Rives LLP

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