

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



**Pacific Gas & Electric Company**  
**ELC (Corp ID 39)**  
**Status of Advice Letter 6883E**  
**As of May 20, 2024**

Subject: Transportation Electrification Advisory Services PG&E's Near-Term Priority Proposal,  
Pursuant to D. 21-07-028

Division Assigned: Energy

Date Filed: 03-16-2023

Date to Calendar: 03-22-2023

Authorizing Documents: D2107028

**Disposition:**

**Signed**

**Effective Date:**

**04-18-2024**

Resolution Required: Yes

**Resolution Number: E-5314**

Commission Meeting Date: 04-18-2024

CPUC Contact Information:

[edtariffunit@cpuc.ca.gov](mailto:edtariffunit@cpuc.ca.gov)

AL Certificate Contact Information:

Stuart Rubio  
(951)965-8905  
[PGETariffs@pge.com](mailto: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- Disposition of Filing (Accepted, Rejected, Withdrawn, etc.)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](mailto:edtariffunit@cpuc.ca.gov)**



**Sidney Bob Dietz II**  
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Regulatory Relations

Pacific Gas and Electric Company  
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March 16, 2023

**Advice 6883-E**

(Pacific Gas and Electric Company ID U 39 E)

Public Utilities Commission of the State of California

**Subject: Transportation Electrification Advisory Services – PG&E’s Near-Term Priority Proposal, Pursuant to D. 21-07-028**

**Purpose**

Pursuant to Ordering Paragraphs (“OP”) 1, 2, and 4 of California Public Utilities Commission (“Commission” or “CPUC”) Decision (“D.”) 21-07-028, Decision Setting Near-Term Priorities for Transportation Electrification Investments by the Electrical Corporations, issued July 21, 2021, Pacific Gas & Electric Company (“PG&E”) hereby submits this Tier 3 Advice Letter (“AL”) requesting approval of its proposed Transportation Electrification Advisory Services (TEAS) program, which addresses the near-term priority area of medium- and heavy-duty vehicles.

**Background**

In December 2018, the Commission opened Rulemaking (R.) 18-12-006, seeking to establish a Transportation Electrification (TE) Framework to address a multitude of issues related to TE investments for the California investor-owned utilities (IOUs).

On July 21, 2021, the Commission issued a near-term priorities decision (“D.”) 21-07-028, which allows utilities to request ratepayer funds (capped at \$20 million) for near-term priority investments for TE in their service territories. The five near-term priority areas include:

- 1) Transportation electrification resiliency;
- 2) Customers without access to home charging;
- 3) Medium- and heavy-duty (MHD);
- 4) New construction, and
- 5) Panel upgrades for low-income ratepayers in underserved communities.

D.21-07-028 authorized the Electrical Corporations to file a Tier 3 AL, which is to be compliant with the Energy Division-developed template, to seek authorization for TE programs in near-term priority areas. Pursuant to that Decision, PG&E files this Tier 3 AL,

utilizing the approved Template, and requesting approval of its proposed \$19.63M Transportation Electrification Advisory Services (TEAS) program, which addresses the near-term priority area of medium- and heavy-duty vehicles.

The TEAS Program aims to provide a comprehensive portfolio of TE advisory services to medium and heavy-duty fleets of schools, transit agencies and small businesses located in underserved communities, as defined by AB 841.

Though PG&E has the previously approved EV Fleet program to provide TE services to MHD Fleets, the program has multiple gaps related to comprehensive guidance and support at multiple stages of TE. Hence, a TE advisory program that would provide a comprehensive TE guidance and support is necessary to advance TE for MHD fleets. The TEAS program aims to address this barrier by providing comprehensive TE advisory services of planning, implantation, grant-writing and post-energization guidance to schools, small businesses and transit agency customers. Throughout the development of this program, PG&E has solicited feedback from multiple community-based organizations, local, state and tribal governments, has incorporated it in the program design, and is planning to do the same throughout the program implementation.

The TEAS Program meets the reasonableness criteria established in D.21-07-028:

- The program serves the near-term priority sector of MHD vehicles;
- The program budget is \$19.63M, below the \$20M limit for near-term priority programs;
- The program directly addresses the lessons learned from PG&E's EV Fleet program, as well as, experience working with schools and transit agencies;
- The costs of the TEAS program are reasonable as even if the program costs \$19.63M, it would bring multiple benefits to ratepayers such as GHG emission reduction of approximately 2603 MT, eGallon cost-savings of \$2.58 per Gallon, a payback period of 3-5 years and long-term rate decline of ~ 2.9%.
- The program helps to develop the private TE charging market and reduce market dependence on ratepayer funding by educating and assisting the market segment on how to navigate and fund fleet electrification so that the customers are empowered to accelerate their fleet electrification; and
- The program complies with the Advice Letter template.

For these reasons, PG&E respectfully requests Commission approval of its proposal for its near-term priority TE program, Transportation Electrification Advisory Services (TEAS).

### **Request for Commission Approval**

PG&E respectfully requests that the Commission issue a Resolution that:

1. Approves the TEAS Program;

2. Authorizes \$19.63M for the TEAS Program to be recovered through distribution rates on an equal cents per kilowatt hour basis;
3. Permits budget funding to be fungible across cost categories to meet customer demand and market needs which may change as the program matures;
4. Directs PG&E to establish a Near Term Priority TE Balancing Account, and associated subaccount for the TEAS Program, pursuant to D.21- 07-028; and
5. Provides any additional direction as the Commission deems appropriate.

### **Protests**

Anyone wishing to protest this submittal may do so by letter sent electronically via E-mail, no later than April 5, 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:

Sidney Bob Dietz II  
Director, Regulatory Relations  
c/o Megan Lawson  
E-mail: PGETariffs@pge.com

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

### **Effective Date**

PG&E requests that this Tier 3 advice submittal become effective upon Commission approval.

### **Notice**

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

\_\_\_\_\_  
/S/

Sidney Bob Dietz II  
Director, Regulatory Relations

Attachments:

Attachment 1 - Near-Term Priorities Advice Letter Template

cc: Service List 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 #: (951)965-8905

E-mail: PGETariffs@pge.com

E-mail Disposition Notice to: stuart.rubio@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) #: 6883-E

Tier Designation: 3

Subject of AL: Transportation Electrification Advisory Services – PG&E’s Near-Term Priority Proposal, Pursuant to D. 21-07-028

Keywords (choose from CPUC listing): Compliance

AL Type:  Monthly  Quarterly  Annual  One-Time  Other:

If AL submitted in compliance with a Commission order, indicate relevant Decision/Resolution #: D.21-07-028

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:

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  
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

# **Attachment 1**

Near-Term Priorities Advice Letter Template

## Near-Term Priorities Advice Letter Template

1. **Subject:** Pacific Gas and Electric (PG&E) Company's Proposal for Transportation Electrification Near-Term Priority Program under the DRIVE OIR (Rulemaking (R.) 18-12-006) – Transportation Electrification Advisory Services (TEAS)
2. **Purpose:** Summarize the proposed program(s) as follows:
  - a. **Describe the program, goals and expected outcomes**

### **Program Background:**

In mid-2021, California Public Utilities Commission (CPUC or Commission) issued a near-term priorities decision<sup>1</sup>, which allows utilities to request ratepayer funds for near-term priority (NTP) investments for transportation electrification (TE) in their service territories. The five near-term priority areas include: 1) transportation electrification resiliency, 2) customers without access to home charging, 3) medium- and heavy-duty (MHD), 4) new construction, and 5) panel upgrades for low-income ratepayers in underserved communities<sup>2</sup>. TEAS addresses the near-term priority area of MHD vehicles.

California has the worst air quality in the country; and four of the top ten cities most polluted by annual particulate matter and five of the top ten worst air quality counties in US are served by PG&E<sup>3</sup>. Transportation, especially trucks, are responsible for 45 percent of the NO<sub>x</sub> pollution in California.<sup>4</sup> According to California Air Resources Board's (CARB) latest published Greenhouse Gas (GHG) emissions inventory, the transportation sector in California accounts for the largest GHG emissions in the state (approximately 37 percent) and nearly 9 percent of the State's GHG emissions arise from MHD vehicles.<sup>5</sup> MHD vehicles are also a large source of particulate emissions and impact the local air quality. CARB is expected to enact the Advanced Clean Fleet (ACF) regulation and has enacted the Innovative Clean Transit (ICT) regulation to address this problem. The primary goal of the ACF regulation is to accelerate the market for zero-emission vehicles (ZEV), such as trucks, vans, and buses, by requiring fleets that are well suited for electrification, to transition to ZEVs where feasible.<sup>6</sup> ICT regulation requires all public transit agencies to gradually transition to a 100 percent zero-emission bus (ZEB) fleet. Beginning in 2029, 100 percent of new purchases by transit agencies must be ZEBs, with a goal for full transition by 2040.<sup>7</sup>

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<sup>1</sup> Decision setting near term priorities for Transportation Electrification Investments by electrical corporations. Available at: Decision (D.)21-07-028

<sup>2</sup> CA Assembly Bill 841. Available at: <https://openstates.org/ca/bills/20192020/AB841/>

<sup>3</sup> [Year-Round Particle Pollution | State of the Air | American Lung Association](#)

<sup>4</sup> [2020 Mobile Source Strategy - May Webinar Presentation \(ca.gov\)](#)

<sup>5</sup> CA 2000-2020 GHG Emissions Inventory published by California Air Resources Board. Available at: [https://ww2.arb.ca.gov/sites/default/files/classic/cc/inventory/2000-2020\\_ghg\\_inventory\\_trends.pdf](https://ww2.arb.ca.gov/sites/default/files/classic/cc/inventory/2000-2020_ghg_inventory_trends.pdf)

<sup>6</sup> CA Advanced Clean Fleets Regulations Summary. Available at: <https://ww2.arb.ca.gov/resources/fact-sheets/advanced-clean-fleets-regulation-summary>

<sup>7</sup> CA Innovative Clean Transit Regulation fact sheet. Available at: <https://ww2.arb.ca.gov/resources/fact-sheets/innovative-clean-transit-ict-regulation-fact-sheet>

## Near-Term Priorities Advice Letter Template

While the regulations will require the fleets to electrify, the fleets often lack the expertise and knowledge necessary for electrification. PG&E's EV Fleet program provides infrastructure support; however, from the lessons learned from this program, customers need education and support in this transition. To support fleets in this transition, PG&E proposes the Transportation Electrification Advisory Services (TEAS) program – which will provide TE advisory services to schools, transit agencies and small businesses<sup>8</sup> located in underserved communities<sup>9</sup>, on the process to electrify their MHD vehicle fleets.

The air emissions arising from MHD vehicle exhaust disproportionately impact underserved communities<sup>10</sup> that are typically located near highway corridors. TEAS aims to provide holistic support to select MHD fleet owners by providing a portfolio of TE advisory services that would enable fleets to electrify more efficiently, cost-effectively and lower their total costs of electrification, which would help accelerate MHD EV adoption, reducing local air pollutant and GHG emissions.

### **Program value proposition:**

### **Gaps identified at PG&E's EV Fleet program:**

PG&E believes that a program focused on providing TE advisory services to fleets is a necessary complement to the existing EV Fleet program<sup>11</sup>. PG&E's EV Fleet program aims to help MHD fleets of multiple sectors cost-effectively and efficiently install charging infrastructure. EV Fleet Onboarding Specialists (OBS) work closely with program participants to screen for eligibility and follow-up with customers through the initial phases of their electrification journey ahead of their participation in the EV Fleet program. Program staff has observed that many customers were interested in participating in the EV Fleet program but needed a trusted advisor to provide information that would allow them to finalize their electrification plan decisions. A program such as TEAS is needed to help bridge that gap, since this comprehensive support is not currently available through EV Fleet program.

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<sup>8</sup> For small businesses segment, TEAS program may consider class 2 trucks to be medium-duty.

<sup>9</sup> AB 841 defines an underserved community as a community that meets one of the following criteria. 1. A community with a median household income less than 80 percent of the statewide average. 2. Census tracts with median household incomes at or below 80 percent of the statewide median income or with median household incomes at or below the threshold designated as low income by the Department of Housing and Community Development's list of state income limits adopted pursuant to Health and Safety Code § 50093. 3. Is within an area identified as among the most disadvantaged 25 percent of the state according to the California Environmental Protection Agency and based on the most recent California Communities Environmental Health Screening Tool, also known as CalEnviroScreen. 4. A community in which at least 75 percent of public-school students in the project area are eligible to receive free or reduced-price meals under the National School Lunch Program. 5. A community located on lands belonging to a federal recognized California Indian tribe.

<sup>10</sup> <https://www.lung.org/clean-air/outdoors/who-is-at-risk/disparities>

<sup>11</sup> PG&E EV Fleet program: [https://www.pge.com/en\\_US/large-business/solar-and-vehicles/clean-vehicles/ev-fleet-program/ev-fleet-program.page](https://www.pge.com/en_US/large-business/solar-and-vehicles/clean-vehicles/ev-fleet-program/ev-fleet-program.page)

## Near-Term Priorities Advice Letter Template

Following are some of gaps observed in the EV Fleet program that the TEAS program can address<sup>12</sup>:

- Delays in signing customer contracts: The EV Fleet program has experienced high cycle times from the date an application is received until the date the contract is fully executed, an average of 204 days. The reasons behind these long timelines are varied but are generally driven by customer decision-making. To get the contract signed, the customer needs to have finalized the number of vehicles, the number and type of chargers, and the location where the infrastructure would be installed. The program has observed that many customers are hesitant to commit to a plan or request changes once a plan has been developed. Even once a contract is issued, a customer still must obtain buy-in from key decision-makers in their organization and provide evidence of their commitment to electrify at least two vehicles by showing proof of purchase for at least one vehicle or a grant award letter or a letter the board authorizing budget for this. Hence a TE advisory program that would address these needs by providing fleet electrification planning guidance would help customers reduce this cycle time. Using TEAS, the customer would be able better decide what site design works best for them, be more likely to obtain grant funding, and be able to put together a demonstrated cost benefit analysis to persuade decision makers to electrify based on TCO and payback analysis.
- Attrition rates: The EV Fleet Program has experienced attrition of 20% for applications and 5% for signed contracts. Although part of attrition is due to sites that are found to be ineligible for the program, EV Fleet has observed other reasons that sites drop out, including: high behind-the-meter (BTM) costs, lack of dedicated personnel available at the customer's organization, customer inability to secure a BTM contractor, losing grants, customer inability to procure EVs, customer challenges obtaining easements, and funding unavailability. This demonstrates that customer need help in multiple areas of TE planning and execution, including planning, implementation, and grant application assistance. A program that provides these advisory services and fills these gaps would certainly be beneficial for reducing the customer attrition rates, and help customers complete their TE projects.
- BTM construction delays: PG&E's EV Fleet program has observed high cycle times from executing the contract to completing the construction of 435 days and that schools, especially the ones located in underserved communities, experience significant construction delays and take the longest to execute their EV Fleet projects. Of the schools located in underserved communities with signed contracts, 39% have been waiting to construct for 18 months or longer due to customer-driven challenges, compared to only 14% for the program overall. Schools find it difficult to conduct a Request for Proposal (RFP) for BTM design and construction and to find qualified BTM contractors. They also have issues obtaining funding to construct the BTM because that requires School Board approval. Hence, a TE advisory program that helps with BTM contractor selection and with obtaining funding through grants will help customers initiate an EV project, and lead to successful deployment of their BTM construction, resulting in high customer satisfaction.

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<sup>12</sup> All EV Fleet program data is as of 02/27/2023.

## Near-Term Priorities Advice Letter Template

- Customers applying for grants: EV Fleet program data shows that 56 percent of customers applied for grants. 22 out of 24 schools and 11 out of 16 transit agencies located in underserved communities have applied for grants. This shows that customers are very much in need of securing external funding for covering the costs of TE. Additionally, the unavailability of TE grant or funding also contributed to customer attrition. A program that provides assistance to customers for researching grant opportunities and preparing grant applications will help customers cover the costs of EVs and BTM infrastructure and remove a major barrier to TE.
- Peak time charging: EV Fleet's Year 2021 evaluation stated that "the grid impacts analysis revealed that approximately 40% of school bus charging sessions impacted electricity consumption during peak hours, when rates were highest. The grid impacts analysis also showed that school bus charging could be shifted away from peak hours." Charging at peak times leads to higher fueling costs and diminishes the benefits of fleet electrification. This shows that customers may lack education on when to charge their EVs and may also be unaware of the different rates available from PG&E that could improve fleet cost effectiveness. Therefore, a program that would educate customers on various opportunities of cost-savings post-electrification would bring substantial value to customers and well as for managing grid operations.

In addition to the gaps identified through the EV Fleet program, PG&E has more broadly observed that customers can struggle to meet our required timelines for preparing and submitting complete engineering packages (site plan, single line diagram, CAD file) once they have applied for service planning energization. In fact, in early 2022, PG&E realized that a substantial amount of preliminary assessments were not moving into the next step in the service planning process, estimating, in a timely fashion, so the company instituted a requirement that customers must submit a complete engineering package within 90 days of pre-assessment. This process change was developed to streamline processes and allocate resources effectively with a goal of driving down energization cycle times. Still, with this requirement in place, EV customers frequently have to request extensions or have projects cancelled. Thus, the TEAS program will not only support customers struggling with or unable to participate in the EV Fleet program – but it will also provide support to the myriad transit, school and small business and municipal fleet customers as they prepare to submit service planning applications to electrify their fleets.

### **Challenges identified by customers:**

PG&E reached out to two transit agencies, one school district and three small businesses to understand their challenges with electrifying their fleets. Some of these were EV Fleet program customers. Below is the summary of the issues experienced by these customer segment and how a comprehensive advisory program is needed to fill these gaps:

- Transit agencies: The transit agencies we talked to faced challenges such as personnel turnover, an inability to win grants, and uncertainty around charging and capacity needs. A transit agency mentioned the need of an optimization tool that would help with deciding

## Near-Term Priorities Advice Letter Template

when to charge, what rates and pricing options were available. These agencies also needed assistance with charger selection, cost analysis and permitting.

- Schools: Customer had to struggle with multiple resources from multiple external organizations to receive grants. Because of this challenge, customer mentioned that PG&E should be more hands-on with the grant assistance. They also mentioned the need to get help with charger selection from PG&E and also mentioned capacity issues.
- Small businesses: Customers, some of whom were last mile delivery services, in general are interested in TE; however, are facing challenges such as: having to do cost analyses themselves, securing funding through financial assistance, and need help with consistency and order with TE steps and with funding to cover EV and infrastructure costs. Customers also provided feedback that PG&E should get customers more involved, act as a liaison, educate them about steps and timelines of TE. Customers also mentioned that PG&E should coach them, help with cost calculations and align expectations.

As discussed in the New York and New Jersey MHDV Fleet workshop<sup>13</sup>, “early, consistent, and frequent communication between fleets and utilities is essential to keeping reasonable timelines and achieving overall project success. Fleets expressed that the best electrification experiences stem from regular standing engagements with designated utility staff and project managers.” The workshop further established the need from TE advisory support from utilities as “Fleet operators are new to vehicle electrification and are not subject matter experts. Likewise, many fleets currently lack the capacity to regularly engage with utilities or manage infrastructure deployment. As such, support from the utility, particularly with issues requiring technical knowledge, is critical to ensuring fleets can move through the electrification process with ease. Fleets will require additional technical assistance from utilities, such as through fleet advisory programs.”

It is evident that though PG&E has a program to provide TE infrastructure support to MHD Fleets, there are additional areas where PG&E can provide support in accelerating TE related to TE guidance, planning, implementation, grant assistance, post-energization support. Providing complimentary support in the form of TEAS would enable more customers to initiate, complete or operate their TE projects efficiently and cost-effectively. Hence, a comprehensive program that would provide planning, implementation, grant-writing and post-energization guidance is necessary to advance TE for MHD fleets. The TEAS program aims to fill this gap by helping schools, small businesses (especially last-mile delivery services)<sup>14</sup>, and transit agency customers located in these communities by providing comprehensive TE advisory services.

PG&E continues to design programs that would help accelerate TE while providing overall net benefits, and TEAS is no exception. Based on PG&E analysis, and conservative estimates for

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<sup>13</sup> [\\*2022-12-21-Final-NY-and-NJ-Fleet-Workshop-Report.pdf \(atlaspolicy.com\)](#)

<sup>14</sup> Businesses are categorized internally by PG&E based on their usage and revenue. TEAS program would collaborate with PG&E’s internal teams to determine whether customers fall in the small/micro business categories.

## Near-Term Priorities Advice Letter Template

the number of customers served, TEAS would provide a three- to five-year payback following the electrification of a typical customer’s MHD vehicle fleet.

### **Program Overview:**

PG&E conducted a customer segmentation review to determine the customer segments that would be the priority of TEAS program. The review looked at the number of transit agencies, schools and small businesses in PG&E’s service area, and also gathered feedback from EV Fleet program on the total number of customers TEAS would serve and what the percentage mix would be. The inputs gathered from the EV Fleet program, and the customer feedback mentioned in the section above, indicated that schools, transit agencies and small businesses were in need of assistance of TE advisory services. Based on the inputs from EV Fleet program, and a market sizing review, the target customer size was determined. The program targets to provide TE advisory services to approximately 250 customers seeking to electrify their MHD vehicle fleets. However, this is only a target number and may vary based on customer interest, gained efficiencies, and resource availability. The program is targeting approximately 100-150 schools, 50 transit agencies and 50-100 small businesses, local utilities, or municipal/city and county fleets. However, the current split is only a forecast, and these quantities may change depending on the interest and availability and interests of these customer segments, market developments and resource availability. Depending on these factors, under the “small business”<sup>15</sup> segment, TEAS program may consider extending the services to municipal fleets such as local utilities or city or county services. The program proposes to assign 100 percent of its budget to customer sites located in the underserved communities. The TEAS program will allow customers to gain comprehensive knowledge about fleet electrification, beginning from initial interest in electrification, planning, implementation, grant availability and post-energization support; and will help customers electrify their fleets faster and cost-effectively.

**Table 1: TEAS Program Overview**

| <b>Program Element</b>      | <b>PG&amp;E’s TEAS Program</b>   |
|-----------------------------|--|
| Commission Review Mechanism | Near Term Priority Tier 3 Advice Letter  |
| Objective                   | To make TE accessible to MHD fleets of schools, transit agencies and small businesses in Underserved Communities |
| Customer segment            | Schools, transit agencies and small businesses   |
| Size                        | Approximately 250 customers  |
| Underserved community goal  | 100 percent of the sites to be in underserved communities as defined by AB 841                                   |
| Cost to participants        | Program offered at no cost to participants   |
| Program cost                | \$19.63M   |

### **Program Goals:**

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<sup>15</sup> For small businesses segment, TEAS program may consider class 2 trucks to be medium-duty.

## Near-Term Priorities Advice Letter Template

The TEAS program offers a portfolio of comprehensive advisory services that would guide schools, transit agencies, and small business customers in underserved communities through the entire TE process at no cost to these customers. The portfolio of advisory services would provide fleets with an end-to-end service, beginning from their initial interest in electrification all the way through post-energization guidance. Fleets can also select the services they want depending on their needs and depending on their stage in TE journey. The goals of the TEAS Program include:

- Simplification of TE process for program customers: TEAS would streamline the EV adoption process by providing clear timelines and instructions for completing each step, reducing the burden of logistical coordination. Furthermore, the TEAS Program Manager (PM) or advisor would be able to answer questions and help coordinate the procedures associated with PG&E's service planning and other internal departments. If any third parties are hired, the TEAS PM or advisor would be a common point-of contact between the customer and the third parties facilitating smooth communications and ensuring the customer and vendor are aligned with clear expectations.
- Build an Experience and Fosters further Electrification: The TEAS Program aims to provide end-to-end TE support to customers. This support should also allow for more successful electrification projects than if the customer were trying to navigate these processes on their own. This long-term support includes ensuring that customers are comfortable with the new technology and possibly influencing them to electrify further in future and/or share their excitement about their electrification journey with their peers, bringing California closer to achieving its climate goals. Successful excellent customer service will help create advocates for the program, and bolster word-of-mouth marketing for the program and fleet electrification more broadly.
- Complement PG&E's EV Fleet program and California policy goals: The TEAS program is designed to complement PG&E's existing EV Fleet program, while also advancing California's ZEV and ZEB goals. TEAS will leverage the lessons learned from EV Fleet program to help address the electrification challenges identified within that program. The benefit to the customer is that the TEAS program would help to provide more comprehensive support and motivate customers to participate in the EV Fleet program. Customers who select TEAS services of fleet planning or grant writing, could be directed to the EV Fleet program once they are fully ready for implementation. Hence, TEAS would act as additional acquisition funnel for EV Fleet and would also help address the resource barriers faced by EV Fleet customers.
- Acquire Useful Data for Strategic Customer Programs and Grid Planning: Through the TEAS program, a variety of data points may be collected from customers, depending on the TEAS offering they choose. This data would help PG&E gain better understanding of EVs and their potential grid impacts and usage, analyze market trends and to understand any remaining gaps for electrification. This data will enable PG&E to strategically develop new

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programs that meet evolving customer needs. Through constant customer interaction, the TEAS program would also provide insight into customers' future TE plans, thus helping identify the locations of future load. This will help customers in long-term, as PG&E can utilize these insights for future grid planning to better serve future customer needs.

- Lowering the cost of fleet electrification: A major barrier towards fleet electrification for schools and transit agencies located in underserved communities is the upfront cost of electrification that includes the cost of EVs, the BTM infrastructure, and (Electric Vehicle Service Equipment (EVSE). TEAS is aiming to address the barrier of high upfront TE cost by providing a grant-writing assistance to customers. TEAS would also offer guidance on opportunities for revenue generation for customers such as obtaining Low Carbon Fuel Standards (LCFS), and cost saving opportunities such as Business EV rates, Vehicle-to-Everything (V2X) pilots and Adaptive Load Management (ALM). These opportunities will help customers lower their cost of ownership as well as their EV operating costs.

### **Stakeholder feedback:**

In addition to the customer outreach mentioned in the Program Value Proposition section above, PG&E solicited feedback from 17 Community-Based Organizations (CBOs) and local, regional and tribal government entities. The following feedback was received and was incorporated into the pilot design:

- To get the most value out of a pilot that offers advisory services, the entity that administers the program should be proactive in moving them through the process by consistently following up with the customer.
  - PG&E has incorporated this feedback into the pilot design by having a trusted TE advisor provide routine status checks and act as the main point of contact for the program.
- PG&E should work with key community associations or stakeholders, such as CBOs and local governments, to get information to schools, small businesses, and transit agencies.
  - PG&E is setting aside a portion of the budget to collaborate in outreach efforts and will continue to engage with CBOs throughout the program.
- PG&E should not rely on web resources only to communicate with customers. Passive information will only reach customers that are already aware of or interested in electrifying.
  - PG&E plans to communicate with customers via channels they prefer or have access to. Customer communications may be delivered via printable materials, email, web resources, and by community-based organizations.
- Outreach materials need to differ between rural and urban areas. There needs to be active targeted outreach in rural areas, especially with the small businesses that need these services the most.
  - PG&E plans to consider differentiated outreach tactics for urban and rural areas based on their level of understanding about TE. PG&E will ensure that CBO outreach materials speak to small businesses through CBO outreach efforts.
- PG&E should engage with more schools, transit boards, and small businesses to solicit feedback. Many of the local governments do not have direct jurisdiction over school and transit entities.

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- PG&E reached out to three small businesses, two transit authorities, and one school district to seek input on the pilot design in the early stages of program development. The purpose of early customer outreach was to seek feedback and validate the value-add from TEAS.
- To gain receptivity in the program, PG&E should emphasize on regulatory requirements for EV adoption in customer communications.
  - PG&E will ensure that customers are aware of state decarbonization goals and how to keep in compliance.
- PG&E should focus a portion of the marketing material on the potential revenue opportunities that switching to TE presents, such as LCFS credits.
  - PG&E has taken this feedback into account in which TE savings and potential revenues are used to incentivize customers.
- PG&E should coordinate with and support entities that are mid-stream in the process of electrifying.
  - TEAS allows customers to select the services that would best support them in whichever step they are in their TE journey.

As mentioned in the sections above, customers specifically emphasized the need for assistance with multiple issues including grant writing services, cost analysis guidance, post energization guidance, planning and implementation assistance including capacity assessment and charger selection. Additionally, customers also emphasized a need to have dedicated PG&E personnel to advise them through multiple steps of TE. All this feedback obtained from customers and other stakeholders have guided PG&E to formulate the individual offerings of the TEAS program as below.

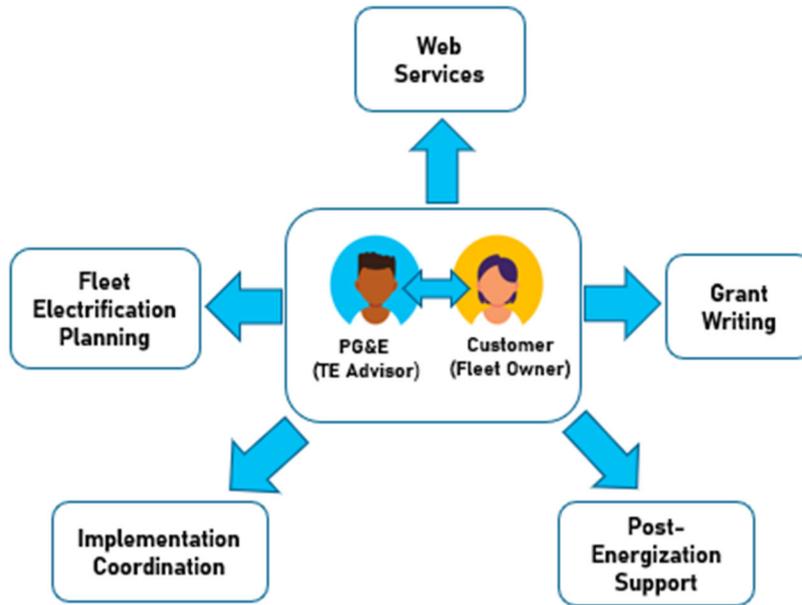
### **Program outline and services offered:**

Based on the feedback received from customers, CBOs and government entities, the TEAS program will consist of a portfolio of comprehensive advisory services that would guide qualified customers through the entire TE process at no cost. PG&E will administer parts of the offerings in-house to utilize the expertise of internal staff. If certain portions of the programs are best served by a third party, then PG&E will contract with a third party implementor.

Customers will likely first engage with the TEAS program through the Marketing, Education and Outreach (ME&O) efforts. ME&O will direct customers to the TEAS webpage where they will be able to apply for the program. Qualifying applicants would be contacted by a TEAS program advisor who would guide them through the various service offerings based on their TE needs, and the processes for obtaining the specific offering(s) they choose.

The schematic below offers a view into the services that would be offered under the TEAS program.

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**Figure 1. Service offerings under the TEAS program**

PG&E is planning to offer the following services under the TEAS program:

- Web services

Many schools and transit agencies lack available staff or the in-house expertise to plan, deploy, and operate EVs. This may either prevent them from initiating an EV project, or it may lead to unsuccessful deployment or operation of their EV fleet. To address this barrier, PG&E would offer web-based services to provide TE guidance and education to customers interested in electrifying their fleet. TEAS program would intentionally drive customers to these services and would encourage them to utilize them. These services are available to all customers; however, TEAS customers would have a dedicated TEAS advisor to walk them through these service offerings and provide guidance on how to utilize the service feature. This guidance from a TEAS advisor would only be available to the TEAS customers and not to the general public.

- EV fleet savings calculator: Customers who are directed to the TEAS program by the ME&O efforts or who visit the TEAS program webpage will be guided to the EV savings fleet calculator<sup>16</sup>. This calculator which already exists as part of PG&E's digital tools, provides features such as Total Cost of Ownership calculators which breakdown vehicle costs, fuel savings, payback period, LCFS credits that could be generated as well as the grants the vehicles would be eligible for. Customers who may not qualify for the TEAS program would also be able to utilize the calculator and make an informed decision about their TE future. Even though it is an already existing tool, the TEAS program would

<sup>16</sup> PG&E's EV fleet savings calculator. Available at: [EV Fleet savings calculator](#)

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enhance some of the features to make the calculator more interactive, customizable and aiding in decision-making by incorporating additional modules for BTM and To-the-Meter (TTM) planning and EV and EVSE selection.

- TE guidebook: PG&E's EV Fleet program provides the EV Fleet guidebook<sup>17</sup> for its customers which provides a comprehensive overview of the TE process. The guidebook covers a variety of topics including site planning, charger selection, understanding TE costs and more. TEAS would update the available EV Fleet guidebook to incorporate the additional offerings available through the program and information applicable to the customer base it intends to serve. In the guidebook, fleets would learn about the basics of charging – how it works, selecting the right charging equipment and more. Customers will also get information about how PG&E can help with charger selection, site planning and design. They can also learn about financial incentives from PG&E and other entities that would help cover infrastructure costs.

- Fleet Electrification Planning

Inputs from EV Fleet program show that customers located in underserved communities, especially schools and transit agencies may not have dedicated resources to plan for their fleet electrification. TEAS would like to address this barrier by providing a service offering of fleet electrification planning. Customers who are eligible to participate in the TEAS program would be offered customized planning for electrifying their fleet. A customized plan for electrification may include the total cost analyses, estimation of environmental benefits such as avoided GHG and air quality emissions. It would also analyze customers' operational needs and based on their current and future operational goals, may provide information about available EV options that could replace their current internal combustion fleet. The plan would also include recommendations for EV charging equipment including the number of chargers, the type of chargers and their power specifications. Additionally, customers would also receive recommendations for any training that would be needed for the operation and maintenance. This would be a significant step towards meeting the customers' sustainability and electrification goals.

PG&E may consider collaborating with a third-party entity to deliver this offering to customers. An end deliverable would be a custom report provided to customers outlining all the elements of TE planning, and possibly also a presentation with a summary for decision makers. Such a custom report with a clearly outlined fleet electrification plan and its costs and benefits would help customers located in underserved communities who own MHD fleets such as schools, transit agencies and small businesses communicate their electrification goals and would also help bring decision-makers along.

- Grant Writing

A major barrier towards fleet electrification for schools and transit agencies located in underserved communities is the upfront cost of electrification that includes the cost of EVs,

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<sup>17</sup> PG&E's EV Fleet guidebook. Available at: [EV Fleet Guidebook](#)

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the BTM infrastructure, as well as the cost of EVSE. Several grants and rebates at state, regional and federal levels may be available to assist with some of these costs. Data from the EV Fleet program shows that 56 percent customers applied for grants, and some have dropped out of EV Fleet program as they could not cover the costs of TE. TEAS is aiming to address the barrier of high upfront TE cost by providing a grant-writing assistance to customers.

Such a service would include researching and reviewing available funding opportunities, determining which opportunities are appropriate for the customer. It would also include analyzing potential competition and crafting a strategy to obtain high scores on grant applications. An application would be prepared for each applicable funding opportunity that a customer would then submit. PG&E may consider contracting a third party to provide this offering, as it may be more cost-effective to hire a third party for developing customized grant applications that would be offered under this service.

- Implementation Coordination

Inputs from EV Fleet program shows that customers are in construction pipeline for hundreds of days and are facing difficulties obtaining BTM contractors. TEAS would also offer various services to help customers coordinate the implementation of BTM and EVSE installation. TEAS does not aim to perform the EVSE or BTM infrastructure installations; it would only provide guidance and assistance needed to implement the EVSE and BTM infrastructure installations. TEAS would provide the following service offerings to eligible customers:

- BTM Contractor List: The lessons learned from PG&E's EV Fleet program, which MHD fleet customers, were incorporated into the TEAS program design. During the implementation of the EV Fleet program, it has been observed that customers faced challenges finding BTM contractors to perform the BTM infrastructure installations. To address this challenge, TEAS may offer a list of BTM vendors available in customers' areas to eligible customers. This would be a list of BTM contractors who would opt-in to be part of the list. The contractors would go through a screening questionnaire to ensure that they have performed BTM installations in the past, are familiar with applicable permitting requirements and construction requirements of local jurisdictions, whether they have the appropriate licenses and follow safety requirements. Customer reviews and customer satisfaction may be also considered as a qualification criteria or basis of removal from the list.
- Capacity Pre-Assessment: PG&E offers an optional capacity pre-assessment service that gives customers information about available circuit capacity, required equipment, and preliminary design at an earlier stage in the site development process. Capacity Pre-assessment is an optional paid service offered by PG&E's service planning organization. TEAS may offer to pay for this service to eligible customers. A TEAS PM would

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provide an overview of PG&E's service planning roadmap<sup>18</sup> and guide customers through the assessment application portal process.

- Adaptive Load Management (ALM) guidance: As part of the service planning application process, customers need to specify the capacity needed for their EV project. ALM can help them reduce the total demand from the grid which plays into the capacity assessment. ALM software services provided by third parties, calculate capacity based on vehicle's charging behaviors. TEAS will educate customers about ALM and provide guidance to customers about ALM software installation services available from third party vendors.
- Unidirectional and Bidirectional Charger Technology Guidance: Customers sometimes run into issues with incompatibility between their buses and chargers, which leaves them without the ability to charge electric buses that have already been delivered to site. This may also lead to increased costs if the chargers need to be replaced. Before making their EVSE installation decisions, it is beneficial for TEAS customers to know about the different types of chargers, especially the bidirectional chargers available in the market. The TEAS program will provide guidance on chargers, as well as on the incentives PG&E offers to cover their costs, and which V2X pilots they can participate in to take advantage of such incentives. PG&E's V2X pilots are at a nascent stage and will evolve over time. The TEAS advisor would provide information to customers on V2X programs and may also direct them to program webpages where they can gain further information.
- Post energization Support

Once customers install chargers, they are often left on their own to think through how to best manage their charging. PG&E learned through the EV Fleet program that many schools are charging their buses during peak hours, which leads to higher fueling costs and diminishes the benefits of fleet electrification. PG&E wants to help customers most effectively and efficiently use their infrastructure.

TEAS will offer post-energization consultation to customers who have completed energization. Such consultations may include guidance on the opportunities to generate revenue and minimize operating costs, as well as education on EVSE operation and maintenance. These services would be offered in the form of periodic phone consultations for a period of six months after customers complete the energization. The post-energization service offering would include guidance on the following:

- Load Management: In order to minimize operating costs, customers would receive guidance on managing their load such as the best time to charge their vehicles to take advantage of best rates, and how the charging levels and timing should be adjusted to spread the charging interval over a length of time.

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<sup>18</sup> PG&E Service Planning Roadmap. Available at: [PG&E service planning and design: EV customer roadmap \(pge.com\)](https://www.pge.com)

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- Business EV (BEV) rates and real-time rate offerings: Customers would be provided with guidance on the subscription-based business EV rate plans, including forthcoming real-time rate options, like PG&E's optional BEV Day Ahead Hourly Real Time Rate, available from PG&E and what the advantages would be. Customers would be educated on the EV rate plans that would meet their EV charging needs while keeping the costs low. The plans provide customizable monthly subscription charges with a time-of-use rate to help customers save money.
  - V2X offerings: PG&E's V2X programs will keep evolving over the next years and TEAS customers will be provided opportunities to enroll in any V2X programs that enable them to generate revenue or minimize operating costs. Customers would also be provided information on existing and upcoming V2X pilots, and general information about V2X as a strategy and a solution.
  - LCFS credits: The TEAS program would provide guidance to customers on the LCFS program and how to generate and sell credits. With electricity as a fuel source for EVs, customers would have the right to generate LCFS credits. The revenue generated from these credits can be used to offset costs from EV purchases and maintenance, charging infrastructure purchases and maintenance, electricity costs and any administrative fees. PG&E will not aggregate LCFS credits on behalf of customers but rather will educate on the regulation, financial benefits, and potentially external vendors that can help them complete their registration and CARB reporting.
  - EVSE Operation and Maintenance: Customers often are unsure of how to operate their newly installed charging equipment and need some guidance regarding the equipment operation and maintenance (O&M) to ensure optimum performance. TEAS customers will be provided with education about how to operate and maintain their charging equipment.
- b.** Program budget (up to \$20 million per program, with a total \$80 million budget per Electrical Corporation)
- i. How much of the proposed program budget will be allocated for 1) infrastructure deployment<sup>19</sup>, 2) marketing, education, and outreach (ME&O), and 3) other expenditures.

The TEAS budget will consist of the annual total budget for each aspect of the program for the number of years that each aspect of the program is proposed to have expenditures. The TEAS budget is based on PG&E's internal estimates for the program implementation years. The program budget is subject to change based on adjustments to the program set-up phase or implementation as explained in the program proposal but will not exceed \$19.63M.

The TEAS budget consists of Administration, IT, ME&O and program offering categories that will help bridge the knowledge and finance gap by expanding TE accessibility in

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<sup>19</sup> As discussed in D.21-07-028, Section 3.1, any proposal for near-term priority investments filed pursuant to the decision should only be for customer-side infrastructure. Utility-side infrastructure will be installed through the utilities' Electric Rules 15/16 or EV Infrastructure Rule.

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underserved communities. PG&E provides a summary of the TEAS budget proposal and more detailed views of the different service offerings below.

**Table 2: TEAS Budget Summary (\$M)<sup>20</sup>**

| Description                       | 2024          | 2025          | 2026          | 2027          | Total          |
|-----------------------------------|---------------|---------------|---------------|---------------|----------------|
| Administration                    | \$0.54        | \$0.54        | \$0.54        | \$0.18        | \$1.79         |
| IT                                | 0.43          | 0.21          | 0.15          | 0.05          | 0.85           |
| Customer Acquisition & Engagement | 0.92          | 0.92          | 0.92          | 0.13          | 2.89           |
| Marketing, Education, & Outreach  | 0.17          | 0.17          | 0.17          | 0.00          | 0.50           |
| Community Outreach                | 0.40          | 0.40          | 0.40          | 0.00          | 1.20           |
| Business Energy Solutions         | 0.05          | 0.05          | 0.05          | 0.00          | 0.15           |
| Web Services                      | 0.45          | 0.19          | 0.19          | 0.00          | 0.84           |
| Fleet Electrification Planning    | 1.24          | 1.81          | 1.81          | 0.00          | 4.85           |
| Grant Writing                     | 0.79          | 1.16          | 1.16          | 0.00          | 3.11           |
| Implementation Coordination       | 0.63          | 0.59          | 0.59          | 0.00          | 1.83           |
| Post-energization Support         | 0.35          | 0.35          | 0.35          | 0.00          | 1.06           |
| Contingency (3%)                  | 0.18          | 0.19          | 0.19          | 0.01          | 0.58           |
| <b>Total</b>                      | <b>\$6.15</b> | <b>\$6.58</b> | <b>\$6.52</b> | <b>\$0.38</b> | <b>\$19.63</b> |

The TEAS service offerings are designed to complement one another and provide a multi-faceted set of solutions to help customers in underserved communities electrify their fleets. The barriers to electrify for customers in these communities are well known and the proposed program assists this specific customer demographic with much needed knowledge and financial resources.

- Administration: funding for general labor to manage the TEAS program, support ongoing reporting efforts, and establish program communications
- IT: funding to enhance PG&E’s existing program tools to receive customer applications, aggregate customer-specific information, track customers through the program journey, and provide access to program management
- Customer Acquisition & Engagement: funding for Onboarding Specialists to engage with prospective customers and support them throughout the TEAS customer journey
- Marketing, Education, & Outreach (ME&O): funding to market the program to underserved community schools, transit agencies, and small businesses to generate leads to be handed over to the onboarding specialists.
- Community Outreach – Funding for CBO and other community partner Outreach

<sup>20</sup> Totals may differ due to rounding.

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- Business Energy Solutions: funding for PG&E's existing Business Energy Solutions customer relationship managers to engage with prospective customers while assisting them with other energy needs and refer them to the TEAS program.
- Web Services: funding to enhance the existing EV savings calculator with more interactive and customizable features to assist customers with the electrification decision-making process and update the existing EV Fleet guidebook.
- Fleet Electrification Planning: funding to provide customers with customized electrification plans that outline charging location, EV and EVSE recommendations, while quantifying environmental benefits and upfront/ongoing costs of the plan.
- Grant Writing: funding to provide customers with assistance in researching and reviewing available grant opportunities while determining which opportunities are appropriate for their needs; it would also include analyzing potential competition and crafting a strategy to obtain higher grant application scores.
- Implementation Coordination: funding for various services to help customers coordinate the implementation of BTM and EVSE installation, such as ongoing, one-on-one discussions between a TEAS advisor and customer regarding implementing ALM, conducting capacity pre-assessments, and bidirectional charger technology, and offering customers a list of BTM contractors
- Post-energization Support: funding to provide post-energization consultations to customers on cost minimization opportunities, such as implementing load management, moving to a business EV rate; or revenue generating opportunities, such as V2X programs and LCFS credits
- Contingency: funding to address for unforeseen issues that are likely to arise as well as estimating uncertainties

PG&E has developed this program based on market analysis, program design best practices, and stakeholder engagement. However, PG&E is aware that it can only offer these programs to customers and encourage their participation through effective ME&O—it cannot control customer interest, participation, or other market factors that may influence participation (*e.g.*, economic downturns or supply chain issues). Therefore, PG&E is requesting that budget funding be fungible across cost categories to meet customer demand and market needs which may change as the program and the market changes and matures.

- c. Duration of program (not to exceed three years, from program launch), including milestones such as launch date and start-up time, if known.

PG&E anticipates that the program duration will be three years. The table below summarizes the estimated timeline, which is contingent upon the Commission's approval of the program.

**Table 3. TEAS program Timeline**

| Timeframe     | Activity   |
|---------------|--|
| Q1 2023       | PG&E files Tier 3 AL   |
| Q4 2023       | Estimated timing of possible commission approval of the AL           |
| Q1 2024       | Estimated program set-up activities                                  |
| Q2 or Q3 2024 | Estimated program implementation                                     |
| Q1 2027       | Estimated program wrap-up/ continuation of existing customer support |

Contingent upon the Commission’s approval of the program by the end of year 2023, PG&E may commence preparatory work and pre-launch activities in early 2024. Also contingent upon the Commission’s approval of the program by the end of year 2023, PG&E may start implementing the program from early 2024 through the end of 2026 and may conduct program close-out activities in 2027. The ending timeframe of the program aligns with the timeline decided by the Transportation Electrification Framework.<sup>21</sup>

- d. Identify the near-term priority area(s) the proposal(s) address
- i. Medium- and heavy-duty

TEAS addresses the near-term priority area of MHD vehicles. According to CARB’s latest published GHG Emissions inventory, the transportation sector in California accounts for the largest GHG emissions in the state, about 37 percent, and nearly 9 percent of the State’s GHG emissions arise from MHD vehicles.<sup>22</sup> MHD vehicles are also a large source of particulate emissions, and end up impacting local air quality. Transportation, especially trucks, are responsible for 45 percent of the NO<sub>x</sub> pollution in California.<sup>23</sup> These emissions impact the low-income disadvantaged communities disproportionately which are located near highways, industrial areas and freight corridors. Many schools and transit agencies lack available staff or the in-house expertise to plan, deploy, and operate EVs. This may either prevent them from initiating an EV project, or it may lead to unsuccessful deployment or operation of their EV fleet. TEAS aims to address the electrification of medium and heavy-duty vehicles by providing a portfolio of TE advisory services that would guide the fleets in the TE journey and accomplish their electrification goals.

- e. Describe the proposed strategy to address the barriers to TE in the targeted near-term priority area(s) (include narrative description) and the metrics to measure the proposed program’s success (i.e., number of ports installed, number of vehicles electrified, etc.)
- Overcoming barriers of TE

<sup>21</sup> D.22-11-040, Decision on Transportation Electrification Policy and Investments, Rulemaking 18-12-006

<sup>22</sup> [https://ww2.arb.ca.gov/sites/default/files/classic/cc/inventory/2000-2020\\_ghg\\_inventory\\_trends.pdf](https://ww2.arb.ca.gov/sites/default/files/classic/cc/inventory/2000-2020_ghg_inventory_trends.pdf)

<sup>23</sup> [2020 Mobile Source Strategy - May Webinar Presentation \(ca.gov\)](#)

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Inputs from PG&E's EV Fleet program discussed in the "Program Value Proposition" section have indicated that many customers do not have the dedicated in-house staff to plan, deploy, and operate EVs. This may either prevent them from initiating fleet electrification, or it may lead to unsuccessful deployment or operation of their EV fleet. To address this barrier, TEAS would offer web-based services to provide TE guidance and education to customers interested in electrifying their fleet.

Customers located in underserved communities, especially schools and transit agencies may not have dedicated resources for fleet electrification planning. TEAS would like to address this barrier by providing a service offering of a customized fleet electrification planning.

A major barrier towards fleet electrification for schools and transit agencies located in underserved communities is the upfront cost of electrification. TEAS is aiming to address the barrier of high upfront TE cost by providing a grant-writing assistance to customers.

Customers sometimes face challenges with deploying their BTM infrastructure which they are unable to overcome. PG&E's EV Fleet program has observed that schools located in underserved communities take the longest to execute their EV Fleet project. Customers sometimes run into issues with incompatibility between their buses and chargers, which leaves them without the ability to charge electric buses that have already been delivered to site. This may also lead to increased costs if the chargers need to be replaced. TEAS pilot would also offer various services to help customers coordinate the implementation of BTM and EVSE installation.

Once customers install chargers, they are often left on their own to think through the post energization issues. To address this barrier, TEAS will offer post-energization consultation to customers who have completed energization. Such consultations may include guidance on the opportunities to generate revenue and minimize operating costs, as well as to educate on EVSE operation and maintenance. TEAS advisory services, including TE custom planning, web services and implementation coordination would educate the schools, transit agencies and small businesses located in these areas about electrifying their fleets and help address the barrier of lack of TE education by filling the TE knowledge gap.

- Metrics of success

TEAS would collect and analyze pilot data on a regular cadence to assess the effectiveness of the pilot. Key data points may include:

- Geographic locations of customers
- Types of customers applying for the program
- Customer acceptance rate
- Industries represented in the accepted customers
  - Schools, transit agencies, small businesses
- Number of customers utilizing each service offering
  - Success rate for grant applications
  - Number of customers opting for bidirectional chargers

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- Customer satisfaction
  - Number of customers participating in EV Fleet program through TEAS program
- f. Describe the partnerships with third parties to reduce costs to ratepayers, support the effectiveness of the program, and/or support the TE market.

To support the effectiveness of the program, PG&E plans to build partnerships with third parties to offer the services of TE custom planning and grant writing. Third party consulting entities have years of experience preparing custom TE plans for fleets. To offer this service effectively, the TEAS program would likely partner with a third-party entity that would prepare a custom TE plan for the TEAS-eligible customers. Similarly, grant application writing is also a labor-intensive process that could benefit from utilizing a third-party partnership. The TEAS program would likely partner with a third-party consulting entity to facilitate the grant application writing process for eligible customers. PG&E plans to leverage new and existing relationships with CBOs, local and regional governments and tribal governments to help promote awareness of the program and drive enrollment. PG&E will continue engaging with all interested CBOs to support program design, implementation PG&E believes that these partnerships would support and enhance the effectiveness of the program.

- g. Describe the potential strategies and opportunities to scale up the program and how this would potentially lead to a reduction in dependence of ratepayer funding over time.

TEAS would partner with CBOs and other community partners to explore opportunities for integrating TE with building electrification and Distributed Energy Resources (DER) deployment in a comprehensive way. Such strategies could include providing advisory services on integration of BTM DERs, such as battery storage, with fleet electrification. Over the years, California's decarbonization goals will likely drive customers to explore opportunities for DERs such as charging their fleet with on-site solar generation coupled with battery storage. The TEAS program would utilize such opportunities to partner with other clean energy programs within PG&E to scale up and reduce the burden on ratepayers. The TEAS program would like to act as the customers' trusted partner in their comprehensive decarbonization journey. TEAS is a more comprehensive version of the Technical Assistance program that will be rolled out as part of the Funding Cycle 1 TEF program. TEAS will enable PG&E to gain valuable lessons learned for what works and what doesn't that can then be incorporated into the technical assistance program that could be offered to all customers.

- h. Describe how much of the installed behind-the-meter infrastructure, including EVSE and make-ready infrastructure, the Electrical Corporation proposes to own.<sup>24</sup>

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<sup>24</sup> As stated on page 37 of D.21-07-024, "to qualify for the advice letter process, utility proposals must limit utility ownership of the EVSE and behind-the-meter infrastructure only to sites in underserved communities. They must limit utility ownership of the EVSE and behind-the-meter infrastructure to no more than 50 percent per each proposal."

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The entire BTM infrastructure, including EVSE and make-ready infrastructure will be owned by customers, and not owned by PG&E. The TEAS program provides TE advisory services only.

**i. Describe the data collection and reporting efforts.**

TEAS will aim to follow the reporting requirements, as applicable, outlined in the Transportation Electrification Activities Pursuant to Senate Bill (SB) 350.<sup>25</sup> PG&E will use the data collection and reporting templates available on the CPUC website under the “reporting requirements” section of the page. Per these requirements, the TEAS program data would be collected, analyzed, and shared with the Commission in the form of annual reports. TEAS program advisors would monitor and evaluate the program on a regular basis. Data collection and analyses will be performed regularly to refine the program best practices.

**j. Describe the proposed ME&O efforts.**

### **Marketing, Education and Outreach (ME&O) Plan**

Marketing Objectives:

PG&E’s marketing objectives are to help further TE through the TEAS program by generating awareness and providing features and benefits of the program to underserved communities that have MHD fleets.

PG&E plans to:

- Inform customers about the no cost advisory services offered through this new program.
- Educate customers on how the services provided by a transportation electrification trusted advisor will streamline and simplify the electrification process.
- Encourage customers to apply for the program through a variety of marketing channels and tactics

**Table 4: Target Market**

| Audience type* | Audience Details                                     | Decision Makers   | Participation Target |
|----------------|--|---|----------------------|
| Schools        | Public and private schools providing K-12 education. | <ul style="list-style-type: none"> <li>• Director of Maintenance, Operations, and Transportation</li> <li>• Superintendent</li> </ul> | 100                  |

<sup>25</sup> Transportation Electrification Activities pursuant to Senate Bill 350. Available at: <https://webproda.cpuc.ca.gov/industries-and-topics/electrical-energy/infrastructure/transportation-electrification/charging-infrastructure-deployment-and-incentives/transportation-electrification-activities-pursuant-to-senate-bill-350>

## Near-Term Priorities Advice Letter Template

|                  |  |   |     |
|------------------|--|---|-----|
|                  |  | <ul style="list-style-type: none"> <li>• Assistant Superintendent</li> <li>• Chief Financial Officer</li> <li>• Finance Director</li> <li>• Project Manager</li> <li>• Technology Manager</li> <li>• Facilities Manager / Planner / Director</li> </ul>   |     |
| Transit agencies | Owners and operators of medium/ heavy duty transit buses, such as city/county/regional agencies or transportation management services. | <ul style="list-style-type: none"> <li>• Director of Maintenance &amp; Vehicle Technology</li> <li>• Executive Director</li> <li>• Vice President of Energy and Procurement</li> <li>• Manager of Air and Climate Policy</li> <li>• Program Manager, Electrification</li> <li>• Director of Process Improvement</li> <li>• Fleet Manager</li> <li>• Director of Mobility Services</li> <li>• Director of Systems Integration</li> </ul> | 50  |
| Small businesses | Small Businesses with medium and heavy-duty fleets. Additional focus on last mile delivery services. <sup>26</sup>                     | <ul style="list-style-type: none"> <li>• Owner</li> <li>• General Manager</li> <li>• Partner</li> <li>• President</li> <li>• Principal</li> <li>• Regional Manager</li> <li>• VP of Operations</li> <li>• VP of Facilities</li> <li>• Facility Manager</li> <li>• Executive Director</li> <li>• Site Manager</li> </ul>   | 100 |

\*All located in AB 841 underserved communities

### Outreach Strategy:

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<sup>26</sup> The last mile delivery process involves delivering a package from the nearest shipping hub to its final destination as cost-effectively and quickly as possible. Last mile carriers are the actual shipping companies that transport packages.

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PG&E will design outreach strategies based on the customer segment need and will utilize extensive customer data and proven techniques to identify and connect with the eligible customers for this program.

- PG&E will ensure outreach is highly targeted towards the audience that meets the AB 841 eligibility requirements.
- Based on feedback received from a number of organizations, one of PG&E's marketing objectives is to include a TE education component for customers, to reach those who may have not yet made definitive decision about transportation electrification.
- When possible, PG&E will use EV Fleet marketing to promote TEAS.
- PG&E plans to take a test and learn approach adjusting tactics based on analysis of results and lessons learned in the prior year.

### Outreach Channels and Tactics:

PG&E uses a multi-channel, multi-touch approach for marketing and outreach to effectively reach and convert the target audience. These ME&O efforts will be critical to raising awareness about the program and encouraging participation.

- PG&E website: Includes updates on the program tailored by target audience segment and cross promotion on related EV web pages.
- Social Media: Includes targeted posts to key customer segments promoting program awareness and participation.
- Digital media: Allows for audience segment targeting using digital content and directing to a customer interest form on PG&E's website.
- Email: Email and direct marketing to the target audience and key decision makers to drive interest and acquisition
- Cross promotion: Cross promote the TEAS to AB841 underserved communities with EV Fleet outreach and other TE programs, where possible.

### Partnerships:

PG&E plans to leverage new and existing relationships with CBOs, local and regional governments and tribal governments to help promote awareness of the program and drive enrollment. PG&E has outlined a CBO partnership outreach approach in response provided for Question 4.

### Proposed ME&O Budget:

PG&E proposes the following budget for the ME&O Plan expenses. The allocations of budget between channels may change based on program needs and adjusting tactics based on lessons learned and the analysis of the prior year's results.

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**Table 5: ME&O Proposed Budget**

| Marketing Channel  | Marketing Tactic   | Metric   | Estimated 3-year budget       |
|--|--|--|-------------------------------|
| Digital & Social Media   | Educate target audience online and drive them to online content and a customer interest form on the PG&E website. Includes targeted posts to key customer segments helping to promote program enrollment.  | Click rate, application, cost per click  | \$280,000                     |
| Email  | Engage the target audience on the program, identify key decision makers, and drive customer acquisition.   | Open rate, click through rate, application   | \$60,000                      |
| Marketing Creative for CBOs and Local, Regional and Tribal Governments | Develop materials to support acquisition, CBO and other partnership outreach. <ul style="list-style-type: none"> <li>• Informational handout</li> <li>• Social media content</li> <li>• Resource and information on pge.com</li> <li>• In-language/multicultural variations</li> <li>• Co-branding templates</li> <li>• Pre-approved graphics/images for template designs</li> </ul> | <ul style="list-style-type: none"> <li>• Informational handouts: QR codes</li> <li>• Social media: impressions, views and engagements (likes and shares)</li> <li>• Information on pge.com: page visits</li> </ul> | \$40,000                      |
| Marketing Labor Support  | Internal marketing labor related to strategy, planning, execution, monitoring, and managing outreach plans   | • N/A  | \$120,000                     |
| <b>Total</b>   |  |  | <b>\$500,000<sup>27</sup></b> |

Program Feedback

<sup>27</sup> This budget only includes the development of marketing materials that can be utilized by CBO's, local, regional, and tribal governments in their outreach efforts. This budget does not include the cost to engage or pay these organizations for outreach, the budget for this can be found in the Appendix, ME&O budget table.

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As a part of developing the ME&O proposal for this program, PG&E solicited feedback from several organizations. Some of the key themes in feedback PG&E received that helped inform the design the ME&O plan were:

- **Education:** One organization noted that a lack of education around TE was a barrier, as well as education on budget and resource requirements. PG&E will focus on educating customers in AB 841 underserved communities about the benefits of this program. This program will directly assist customers on a one-to-one basis to help them learn about transportation electrification program options that may fit their business needs and help them navigate financial challenges with grant writing assistance.
  - **Small business targeting:** There was a recommendation to specifically target small businesses. PG&E's program has a goal for approximately 100 of the 250 program participants to be small businesses. However, this number is tentative, and may change based on interest and availability of the specific customer segment. PG&E's marketing will target outreach to small businesses with MHD fleets. PG&E also plans to have an additional focus on targeting small businesses that are last-mile delivery services.
  - **Rural customer support:** Additional feedback was provided around rural customers and their need for unique support, as their challenges may be different due to the rural environment. The advantage with the TEAS program is that each customer will have a one-on-one consultation with the advisor that can help give them guidance on how to navigate the different challenges rural areas may be faced with.
- 3. Ratepayer Protections:** Summarize how the proposed program incorporates measures to limit financial impacts and risks to ratepayers.
- a. Describe how the proposal will leverage ratepayer and non-ratepayer funding to accelerate transportation electrification at a lower cost to ratepayers.
    - i. What is the estimated per site funding<sup>28</sup> (percentage of site costs or dollar amount) that the Electrical Corporation's ratepayers will pay?

Ratepayer funds will be used for providing program services and program administration costs under the TEAS program. TEAS would offer multiple services to customers as mentioned above in the pilot design. Different customers may opt for different services from the service offerings portfolio. All customers may not opt for each of the five service offerings. Hence the cost of per site funding would depend on the number of customers utilizing each service offering. Assuming all customers will utilize all the service offering, the per customer cost will be approximately \$78K. Ratepayers are not burdened with EV, EVSE or BTM. costs, as these costs will be paid by the customers.
    - ii. What is the estimated per site funding (percentage of site costs or dollar amount) for which the site-host will pay?

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<sup>28</sup> Customer-side of the meter costs only

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All the service offerings under the TEAS program would be funded by ratepayers. The program does not actually perform any installation of ports. It would only be offering TE advisory services. Site hosts will not be paying for any services offered under the TEAS program.

- iii. If applicable, what is the estimated per site funding (percentage of site costs or dollar amount) for which a third party will pay?

The TEAS program will not be utilizing any third party funds for any service offerings. Hence, no third party will be paying for any site costs.

- iv. Describe, and provide workpapers as applicable, how the Electrical Corporation determined that the per port costs are reasonable for this program and market segment. Compare the proposed per port costs to past experience and to the average per port cost thresholds the CPUC has adopted in recent TE decisions.<sup>29</sup>

The TEAS program will not be installing any ports and hence at this time cannot predict the number of ports customers would want to install at their sites, hence estimation of “per port” costs may not be feasible. The TEAS program would offer TE advisory services, and would not be conducting installations of charging ports, hence the per-port costs may not be applicable to the program. Assuming all customers will utilize all of the service offerings, the per customer cost that ratepayers would pay would be approximately \$78K, which is much less than EV Fleet programs per customer cost of approximately \$267K.

Overall, PG&E believes the benefits outweigh the costs of the TEAS program, which would bring significant benefits to ratepayers, customers and to the State of California, as noted in the next section.

### **Benefits of TEAS program:**

Utility TE investments enable both greater EV deployments and greater long-term decreases in retail electricity rates.<sup>30</sup> Hence, with a forward-looking, long-term perspective, PG&E believes that the investment in the TEAS program would accelerate TE for MHD fleets and will also bring long-term benefits for California’s ratepayers, including:

- Rate decline in long-term: A recent research study<sup>31</sup> from Lawrence Berkeley National Laboratory (LBNL) states that “While utility infrastructure investments that enable greater EV deployment initially cause retail electricity rates to rise ~1.6%, increases in

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<sup>29</sup> D.20-08-045 and D.21-04-017

<sup>30</sup> Quantifying the financial impacts of electric vehicles on utility ratepayers and shareholders, Lawrence Berkeley National Laboratory, February 2023. Available at: [\\*PowerPoint Presentation \(lbl.gov\)](#)

<sup>31</sup> Id. As 30

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sales from EV load cause rates to decline ~2.9% in the later years of the analysis period. A forward-looking, long-term perspective is therefore necessary to overcome near-term rate increases.” This rate decline is a significant long-term benefit for California’s ratepayers and shareholders.

- GHG emission reduction: The TEAS program does not mandate actual fleet electrification for customers. However, assuming that each customer electrifies at least one vehicle, and assuming the same the per vehicle GHG emission reduction in both EV Fleet and TEAS programs, the TEAS program would reduce GHG emissions by 2,603 MT GHG.<sup>32</sup> This is a significant benefit for the State of California’s GHG emission reduction goals of reducing GHG emissions by 40 percent below the 1990 emissions by 2030.<sup>33</sup>
- Payback period: PG&E continues to design programs that would help accelerate TE while providing overall net benefits, and TEAS is no exception. Based on PG&E analysis, and conservative estimates for the number of customers served, TEAS would provide a three- to five-year payback following the electrification of a typical customer’s MHD vehicle fleet.
- eGallon cost savings: Data from PG&E’s Business EV (BEV) rates show that by replacing their Internal Combustion Engine (ICE) vehicles with EVs, customers could save up to \$2.58 per gallon, assuming the cost of gasoline or diesel gallon to be \$4.56 and the cost of eGallon to \$1.98. This will help customers reduce the operating cost of TE and motivate them to electrify their fleets.
- Value of managed charging: The TEAS program would provide guidance to customers on ALM and various managed charging opportunities and rate options that would help increase the business case to electrify their fleet. Such managed charging could provide multiple benefits, including the reduced distribution system investment costs of 5-1090 \$/EV/year.<sup>34</sup>

initial utility infrastructure investments enable both greater EV deployments and greater long-term decreases in retail electricity rates. Hence, with a forward-looking, long-term perspective, PG&E believes that the investment in the TEAS program would accelerate TE for MHD fleets and will also bring long-term benefits for California’s ratepayers.

- b.** Describe how specific lessons learned from previous TE programs were incorporated into the proposal? At minimum, describe how the Electrical Corporation used prior program evaluation results, data and lessons learned to assess the appropriate proposed budget, per-port cost estimate, ownership design, and outreach plan.

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<sup>32</sup> Per the EV Fleet program evaluation report, the 2021 GHG emission reduction for EV Fleet program were 2655 MT, which include included 255 vehicles electrified based on the EV fleet program data. Emission reduction/vehicle = 2655 MT/255 =10.4MT. Emission reduction for 250 TEAS vehicles assumed = 10.4 MT\*250 = 2603MT

<sup>33</sup> <https://ww2.arb.ca.gov/our-work/topics/climate-change>

<sup>34</sup> [Assessing the value of electric vehicle managed charging: a review of methodologies and results - Energy & Environmental Science \(RSC Publishing\)](#)

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- i. In addition, how did the Electrical Corporation incorporate input from stakeholders with expertise in the target sector within the program design?

The lessons learned from PG&E's EV Fleet program were the reason to develop the TEAS program. As mentioned previously, customers were interested in participating in the program but weren't quite ready to electrify and were looking to PG&E to provide information that would allow them to finalize their electrification plan decisions. A program such as TEAS is needed to help bridge that gap and this comprehensive support is not something that we offer in the EV Fleet program.

Based on the gaps observed in the EV Fleet program as described in detail in the program value proposition section of this document, below are the lessons learned and how TEAS program would address them:

- 56 percent customers are interested in obtaining grants. Customers also end up leaving the EV Fleet program if they do not have sufficient funds for TE projects.
  - TEAS program would offer grant writing service that would prepare grant applications for customers. These grants, if received, should cover the various costs related to TE.
- Customers face challenges finding BTM contractors. Projects are delayed in construction pipelines for 435 days on average.
  - TEAS program would offer an implementation an opt-in list of BTM contractors which customers can use to find BTM contractors located in their areas.
- Customers face challenges with planning and finalizing TE projects. This actually delays getting buy-ins from their stakeholders and delays contracts signing with EV Fleet program. Average delay time was 204 days.
  - TEAS program would offer TE planning service that would include TE cost analysis, emission reduction benefits, EV and EVSE options and availability.
- Customers lack dedicated staff for their TE projects. This causes delays in planning and implementing their projects.
  - TEAS program would provide a dedicated TE advisor to customers who would walk them through all the services available, help them select services based on their TE needs, and remain as a point of contact as they receive the selected services.
- Customers face challenges after energization. This includes lack of charger operation knowledge and lack of education on different rates based on charging times. 40 percent of school customers were charging at peak times.
  - TEAS program would offer post-energization guidance services that would include BEV rates and load management guidance, as well as guidance about operating and maintaining EVSE.

The TEAS program also incorporated lessons learned from conversations with Southern California Edison (SCE). The advisory services program provided by them included high-level consultation, grant preparation assistance and generic TE education. However, it did not include EVSE and EV availability information, implementation coordination

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or post-energization assistance. Taking this information into account, TEAS decided to provide more comprehensive services to customers in order to help them throughout their TE journey.

The TEAS program also gathered feedback from multiple CBOs, customers and local, regional and tribal governments, and incorporated it into the pilot design. The details of this feedback are included in various sections of this document including “Stakeholder Feedback” and “Lessons learned from customers” sections above and also in Question 4 below.

- c. Describe the provision(s) that the Electrical Corporation will propose to be within a customer agreement(s) and the agreement(s) with qualified participating vendors, including Electric Vehicle Service Providers (EVSP), that will ensure the Electrical Corporation and any contracted program evaluator will have access to data needed for program evaluation, such as EVSE usage data, ongoing EVSE maintenance and networking fee cost data, etc.

The TEAS program would include language in any third-party contracts and customer agreements to ensure that any contracted third party will have access to data needed for program evaluation, such as, but not limited to, EVSE usage data, ongoing EVSE maintenance and networking fee cost data.

- 4. **Equity and Environmental Justice:** Summarize how the proposal incorporates equity and environmental justice measures into the design and implementation of the proposed program.
  - a. Describe how the proposed near-term priority program complies with the Equity and Environmental Justice requirements adopted in D.21-07-028.
    - i. Identify the percentage of the proposed program infrastructure or expenditures that will be allocated for customers living in underserved communities (minimum 50 percent).
      - 1. Which underserved community criteria(s), based on the definition included in Assembly Bill 841 (Ting, 2020), will the proposed program prioritize?

Executive Order (EO) N-79-20 established a goal to transition 100 percent of the drayage truck fleet to zero-emissions by 2035 and the remainder of MHD vehicles in operation to zero-emission where feasible for 2045.<sup>35</sup> Furthermore, the State of California announced a Memorandum of Agreement with 14 other states and the District of Columbia to accelerate truck and bus electrification, with a goal of ensuring that 100 percent of all new MHD vehicle sales are ZEV by 2050, and an interim target of 30 percent ZEV sales by 2030.<sup>36</sup> To meet California’s ambitious decarbonization goals, there is a priority to increase TE support and infrastructure deployment for MHD fleets in underserved communities. These communities are underinvested in, overlooked, and overburdened with the negative impacts of climate change, including criteria pollutants, toxins, and GHG emissions. Therefore, PG&E proposes that the TEAS pilot only serve customers in underserved communities as defined in AB 841.

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<sup>35</sup> Executive Order N-79-20, available at: <https://www.gov.ca.gov/wp-content/uploads/2020/09/9.23.20-EO-N-79-20-Climate.pdf>

<sup>36</sup> Multi-State Medium- and Heavy-Duty Zero Emission Vehicle Memorandum of Understanding (MOU), available at: [Multistate-Truck-ZEV-Governors-MOU-20200714.pdf](https://www.ca.gov/wp-content/uploads/2020/07/14-Multistate-Truck-ZEV-Governors-MOU-20200714.pdf) (ca.gov)

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AB 841 defines an underserved community as a community that meets one of the following criteria. 1. A community with a median household income less than 80 percent of the statewide average. 2. Census tracts with median household incomes at or below 80 percent of the statewide median income or with median household incomes at or below the threshold designated as low income by the Department of Housing and Community Development's list of state income limits adopted pursuant to Health and Safety Code § 50093. 3. Is within an area identified as among the most disadvantaged 25 percent of the state according to the California Environmental Protection Agency and based on the most recent California Communities Environmental Health Screening Tool, also known as CalEnviroScreen. 4. A community in which at least 75 percent of public-school students in the project area are eligible to receive free or reduced-price meals under the National School Lunch Program. 5. A community located on lands belonging to a federal recognized California Indian tribe.

TEAS would serve schools, transit agencies and small businesses that would fit into any of the above criteria.

2. If applicable, discuss how the proposed program will ensure incentives reach customers located across a broad geographic distribution.

TEAS is a guidance and planning service, with a trusted TE advisor being the main point of contact. PG&E will use ME&O and local CBO outreach efforts to encourage customers across PG&E's territory to join the program. PG&E would partner with local CBOs who may have established partnerships with local schools and transit agencies that would help reach customers located across a broad geographic location.

- ii. Discuss how Community-Based Organizations (CBO) contributed to the development of the proposed program.
  1. How many CBOs, and which ones, were consulted during the development of the proposed program?
  2. What input did the CBO(s) provide and how was it incorporated into the proposed program?
  3. What, if any, CBO input was not accepted into the proposed program, and why was it not included?

PG&E met with multiple CBOs within our service territory throughout the TEAS program design process. In the early program formulation process in February 2022, PG&E met informally with MHD customers and utilities to first identify barriers in EV adoption and to set the groundwork for the technical advisory service. From the feedback in this initial engagement, formal meetings were scheduled with CBOs in June of 2022 to solicit community specific input.

PG&E presented the early pilot design of TEAS in the C-PAC Council Q2 meeting in June 2022 and again in the C-PAC Council Q4 meeting in December 2022. PG&E also offered individual meetings with groups outside of the PAC meeting that were conducted over Microsoft Teams. A total of 10 different CBOs were engaged with

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iteratively, including an environmental justice group. The list of CBOs that were engaged with is provided in Attachment B.

The CBOs were broadly supportive of the TEAS program proposal. The parties were generally in favor of an advisory service and capacity guidance programs due to infrastructural and resource barriers identified within their communities. CBOs asked questions about the various buckets of offerings, including customized TE planning, grant writing, implementation coordination, and post-energization and offered support in ME&O efforts. With the wide range of high-level suggestions from CBOs, PG&E incorporated the feedback into the program design, including:

- To get the most value out of a pilot that offers advisory services, the entity that administers the program must be proactive in moving them through the process by consistently following up with the customer. PG&E has incorporated this feedback into the pilot design by having a trusted TE advisor provide routine status checks and act as the main point of contact for the program.
  - PG&E should work with key community associations or stakeholders, such as CBOs and local governments, to get information to schools, small businesses, and transit agencies. PG&E will continue to engage with CBOs throughout the program and is setting aside a portion of the budget to collaborate in outreach efforts.
  - PG&E should not rely on web resources only to communicate with customers. Passive information will only reach customers that are already aware of or interested in electrifying. PG&E plans to communicate with customers via channels they prefer or have access to. Customer communications may be delivered via printable materials, email, and web resources.
  - Outreach materials need to differ between rural and urban areas. There needs to be active targeted outreach in rural areas, especially with the small businesses that need these services the most. PG&E will consider differentiated outreach tactics for urban and rural areas based on their level of understanding about transportation electrification. PG&E will ensure that CBO outreach materials speak to small businesses through CBO outreach efforts.
- iii. Describe the support the proposed program has from local, regional, and/or tribal governments within the Electrical Corporation's service territory.
1. Which specific local/regional/tribal governments offered their support for the proposal?
  2. What, if any, concerns were raised by local/regional/tribal governments, and how does the proposal address these concerns?
  3. Discuss ways in which the Electrical Corporation will continue to consult with the local/regional/tribal governments throughout program implementation to ensure the local governments are continually heard?

PG&E met with representatives from six different public agencies within the service territory, including local governments, regional governments, and an air pollution control district, and three different tribes. All meetings were conducted one-on-one over Microsoft Teams. The agency members expressed general support for the TEAS pilot.

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Many agencies agreed that a free technical advisory service would address gaps in TE implementation coordination and barriers to entry in the EV market. There was also broad support for the “a la carte” aspect of the program, allowing customers to select the services that would most benefit them in their TE journey. The list of organizations that PG&E met with is provided in Attachment B. The municipal organizations offered a wide range of high-level recommendations that were integrated into the pilot design. These include:

- PG&E should engage with more schools, transit boards, and small businesses to solicit feedback. Many of the local governments do not have direct jurisdiction over school and transit entities. PG&E reached out to three small businesses, two transit authorities, and one school district to seek input on the pilot design in the early stages of program development. The purpose of early customer outreach was to validate the value-add from TEAS.
- To gain receptivity in the program, PG&E should emphasize regulatory requirements for EV adoption in customer communications. PG&E will ensure that customers are aware of state decarbonization goals and how to keep in compliance.
- PG&E should focus a portion of the marketing material on the potential revenue opportunities that switching to TE presents, such as LCFS credits. PG&E has taken this feedback into account in which TE savings and potential revenues are used to incentivize customers.
- PG&E should coordinate with and support entities that are mid-stream in the process of electrifying. TEAS allows customers to select the services that would best support them in whichever step they are in their TE journey.

PG&E will continue to engage with local, regional, and tribal groups throughout program set up and implementation.

- iv. Discuss the measures that will ensure that EV charging infrastructure deployed in underserved communities is accessible (i.e., available, safe) and tailored to the needs of the community’s residents (e.g., considers locations that are specifically well suited to the residents, makes accommodations for accessibility tailored to the location, reaches out to the community in a way that understands the community dynamics, etc.).
  1. What measures did CBO(s) recommend?
  2. How will the proposed measures increase awareness of available EV charging infrastructure for community members who may lack access to home EV charging facilities?
  3. How do the proposed measures address each of the following:
    - i. Local language considerations
    - ii. Americans with Disabilities Act (ADA) accessibility
    - iii. EVSE visibility
    - iv. Public education on EV compatibility
    - v. Cultural considerations of local history
    - vi. EV driver and community safety
  4. Attach the plan(s) to describe how the Electrical Corporation will work with site-hosts to increase accessibility at any publicly accessible EV charging location, for sites located in an underserved community and non-underserved communities. (e.g.,

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measures to install lights, measures to protect EV charging infrastructure and customer from snow and ice, etc.) Please be sure to discuss how the Electrical Corporation is working with CBOs to develop this plan(s).

TEAS does not intend to increase awareness of available EV charging infrastructure for communities who may lack access to home EV charging facilities, as the program does not address the light-duty charging infrastructure segment. However, by targeting key community pillars such as schools, transit agencies, and small businesses, TEAS anticipates a trickle-down effect that promotes a widespread awareness for ZEVs throughout the community. Our hope is that customers who participate and find success in TEAS will become advocates for customers in other underserved areas. We intend to use ME&O efforts to further the reach to our customers.

TEAS does not install publicly accessible EV charging or infrastructure; however, PG&E recognizes that measures of accessibility and safety are critical for proper EV adoption. In the fleet electrification process, PG&E will support customers to create a customized TE plan to ensure the selection of EV vehicles, chargers, charging locations, and implementation are accessible, safe, and well-suited to the community's needs. There will be implementation considerations integrated in the initial design such as cold weather operations and trenching to prepare for additional chargers in the future. The details of these considerations will be modified based on the priorities and specifications of each community site.

PG&E consulted with CBOs throughout the program development to discuss the ways that accessibility and safety should be addressed with a community-based lens. CBOs recommended that PG&E collaborate with each individual school, transit agency, or small business to implement measures of accessibility and community-specific input in the implementation plans. PG&E acknowledges that each community has their own unique set of needs and barriers and plans to work with the individual site hosts to ensure that measures of ADA accessibility, cultural considerations, education on EV equipment, and EV driver and community safety are proactively addressed.

- v. Discuss how the proposed program will ensure marketing, education, and outreach (ME&O) efforts are designed and will be implemented to promote more equitable outreach and program participation.
  1. How was the ME&O plan informed through outreach with CBO(s) and local/regional/tribal governments?
  2. What is the actual (\$) and percentage of total ME&O budget that is dedicated to CBOs to execute outreach to community residents?
  3. How will the Electrical Corporation determine the qualifications of the CBO(s) prior to selecting them to implement a portion of the ME&O efforts?
  4. What measures will be used to ensure the CBO(s) is accomplishing their intended goals?
  5. How will the Electrical Corporation and CBO(s) agree to a division of labor for the ME&O efforts?

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PG&E solicited feedback from several organizations throughout the program design. Several suggestions were implemented in our program design and ME&O plan, reference question 4 sections iii and iv above and the ME&O plan section G. PG&E will continue engaging with all interested CBOs to support program design, implementation and outreach but recognizes that formal paid contracts with CBOs are needed to achieve a robust and comprehensive outreach approach to equity customers. Approximately \$1.2 million or more than 70 percent of the total ME&O budget<sup>37</sup> would be dedicated to direct community outreach efforts. The budget funding for CBO outreach may be adjusted depending on contingent factors such as program participation and outreach evaluations.

PG&E will use a solicitation process to contract with CBOs across the service territory in supporting outreach to underserved communities. The contract will lay out the scope of work and deliverables expected from the CBOs. The specific strategy and tactics of outreach may be developed in partnership with the selected CBOs and tailored to their communities. PG&E will determine the qualifications of the CBOs based on their application responses to the solicitation request. CBOs will be chosen based on several measures such as, if they serve priority communities, whether they have existing contracts with schools, transit agencies, or small businesses, size of service territory, and outreach capabilities. PG&E will set up a regular cadence of meetings with the implementer to evaluate progress of ME&O efforts and identify opportunities to improve the process. PG&E will regularly assess internal ME&O efforts to identify any need for change. Marketing metrics will also be utilized to track outreach efforts, such as the number of site visits through QR codes placed on outreach materials.

- vi. Describe how the proposal will address the barriers to equity identified in the Commission’s Environmental and Social Justice (ESJ) Action Plan, Tribal Consultation Policy, and Part B of California Air Resource Board’s (CARB) Low-Income Barriers Study.
  1. Please list each barrier to equity that the program will address in the proposal and how the proposal seeks to overcome this barrier(s).

PG&E is committed to integrating equity and access considerations throughout TEAS to reduce barriers in underserved communities and promote equitable electrification. To address the frontline barrier of awareness, TEAS will prioritize educating customers about TE through ME&O efforts with the support of CBOs. PG&E will also provide an EV Fleet Calculator, which is an interactive web resource that allows customers to estimate and compare costs, savings, and EV incentives tailored to their fleet. In the program, the trusted TE advisor will act as the main point of contact, which allows a linear channel of communication for customers to direct their questions and concerns throughout the entire TE process.

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<sup>37</sup> CBO outreach \$1.2M/(ME&O \$0.5M + CBO outreach \$1.2M)= 70 percent

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The CPUC's ESJ Action Plan<sup>38</sup> serves as an operating framework to incorporate ESJ considerations into agencies' work. Within the framework, the CPUC has identified priority action items for implementation to overcome TE barriers. PG&E will contribute to the following goals that align with the ESJ Action Plan.

Goal 2: Increase investment in clean energy resources to benefit ESJ communities, especially to improve local air quality and public health.<sup>39</sup>

- PG&E acknowledges that communities that are traditionally underserved also bear the greatest environmental health repercussions. TEAS strives to improve local air quality by reducing the barriers of entry for underserved communities to switch to clean transportation alternatives.

Goal 3: Strive to improve access to high-quality water, communications, and transportation services for ESJ communities.<sup>40</sup>

- TEAS is designed to increase access to clean transportation in priority communities.

Goal 5: Enhance outreach and public participation opportunities for ESJ communities to meaningfully participate in the CPUC's decision-making process and benefit from CPUC programs<sup>41</sup>

- PG&E engaged with CBOs throughout the development of TEAS to ensure that the design effectively serves fleets and is tailored to the needs of community residents. We will continue to work with CBOs through the implementation phase of the program upon approval.

The CARB Low Income Barriers Study<sup>42</sup> is a guidance document that identifies the barriers to accessing clean transportation and mobility options and offers recommendations to overcome these barriers. CARB identifies six priority recommendations that have the largest near-term impact. The recommendations target the five categories of barriers identified by CARB: 1) access and reliability, 2) convenience, 3) safety, 4) demographic characteristics and community setting, and 5) infrastructure and investments.<sup>43</sup> Out of the six priority areas, the TEAS pilot contributes to the following:

1. Expand assessments of low-income resident transportation and mobility needs to ensure feedback is incorporated in transportation planning<sup>44</sup>

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<sup>38</sup> CPUC Environmental and Social Justice Action Plan. Available at: <https://www.cpuc.ca.gov/news-and-updates/newsroom/environmental-and-social-justice-action-plan3>

<sup>39</sup> Id at 29

<sup>40</sup> Id. at 29

<sup>41</sup> Id. at 29

<sup>42</sup> CARB Low-Income Barriers Study Part B: Overcoming Barriers to Clean Transportation Access for Low-Income Residents. Available at:

[https://ww2.arb.ca.gov/sites/default/files/2018-08/sb350\\_final\\_guidance\\_document\\_022118.pdf](https://ww2.arb.ca.gov/sites/default/files/2018-08/sb350_final_guidance_document_022118.pdf)

<sup>43</sup> Id at 33

<sup>44</sup> Id. at 33

## Near-Term Priorities Advice Letter Template

- The target audience for TEAS is 100 percent in priority communities as defined by AB 841. PG&E solicited feedback from CBOs throughout the development of TEAS to ensure the program effectively serves community needs.
- 2. Develop an outreach plan targeting low-income residents across California to increase residents' awareness of Clean Transportation and Mobility Options<sup>45</sup>
  - The ME&O plan is tailored towards underserved communities and emphasizes educating customers on TE. PG&E plans to maintain active communication channels and involve CBOs in ME&O efforts through implementation.
- 3. Develop regional one-stop-shops to increase consumer awareness and provide technical assistance<sup>46</sup>
  - TEAS is a comprehensive advisory service that would include technical assistance for those in AB 841 communities.
- 4. Develop guiding principles for grant and incentive solicitations to increase access to programs and maximize low-income resident participation<sup>47</sup>
- 6. Identify and expand funding and financing for clean transportation and mobility projects, including infrastructure, to meet the accessibility needs of low-income and disadvantaged communities<sup>48</sup>
  - PG&E addresses both priority recommendations in the grant writing offering in TEAS.

The CPUC's tribal consultation policy provides a framework to establish and maintain effective and respectful relationships with tribes. To support the tribal office's mission statement, the CPUC commits to the following:

- Provide Tribes with information about our Tribal technical assistance and grants.
- Develop mutually beneficial intergovernmental cooperation with tribal governments.
- Consult with tribal representatives on the development of CPUC policies.
- Provide information on hearings, proceedings and meetings affecting Tribal members.
- Review and recommend a legislative agenda that promotes the health, safety, and welfare for tribal people.
- Work to improve relationships between CPUC and Tribal governments.<sup>49</sup>

PG&E met with three different tribes during the pilot design process to solicit feedback on TEAS. PG&E will continue its engagement by keeping tribal communities up to date with program information and timelines.

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<sup>45</sup> Id. at 33

<sup>46</sup> Id. at 33

<sup>47</sup> Id. at 33

<sup>48</sup> Id. at 56

<sup>49</sup> Id. CPUC Tribal Consultation Policy

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- vii. Describe how the proposed program will further the principles of economic equity and promote access to high quality jobs for residents of underserved communities<sup>50</sup> through at least one of the following measures.
  1. What job quality measures, such as wage and benefit standards and responsible contractor standards are included in the proposal?
  2. What job access measures, such as targeted hire requirements as well as specified targets for residents of underserved communities, are included in the proposal?
  3. What comprehensive project agreements addressing both job quality and job access, such as application of the Skilled & Trained Workforce<sup>51</sup> requirement and use of Community Workforce Agreements for large-scale TE projects, are included in the proposal?
  4. What amount of proposed funding would be directed to training partnerships that are guided ensure that investments are connected to and result in the placement in high-quality jobs?

To support sites in third party infrastructure installation, PG&E will provide a contractor list as part of the implementation coordination offering. Contractors may be asked to self-report standards, and submit a request to opt-in to this list if they meet the requirements in the initial screening questionnaire. The measures within the contracting screening process will be aligned with the recommendations and requirements in the Transportation Electrification Framework (TEF) program.<sup>52</sup> Through this process, contractors will be asked questions regarding their experience with EV projects, familiarity with PG&E's Greenbook,<sup>53</sup> relevant safety standards and local, state and federal laws, and citation history to ensure high-quality contractor participation.

### 5. Equipment Eligibility Requirements:

- a. Describe the process that will be used to qualify equipment in the program?
  - i. Does the proposal request to pre-qualify equipment that was approved for a similar program previously authorized by the CPUC?
- b. List the proposed minimum equipment technical requirements for EV charging equipment to meet to qualify for the program.
  - i. Do these proposed technical requirements align with the CPUC's efforts to support open standards, and ensure ratepayer funded infrastructure is capable of high-level communications, as defined in the final report from the 2017 VGI Working Group?
  - ii. How do these qualifications align with the EVSE qualification requirements adopted in the CPUC's recent decisions<sup>54</sup> and the EV charging technical needs identified in Chapter 5 of the California Energy Commission's (CEC) Assembly Bill (AB) 2127 Electric Vehicle Charging Infrastructure Assessment<sup>55</sup>?

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<sup>50</sup> See California Workforce Development Board's *High Road Training Program*. [https://cwdb.ca.gov/wp-content/uploads/sites/43/2019/09/High-Road-ECJ-Brief\\_UPDATED-BRANDING.pdf](https://cwdb.ca.gov/wp-content/uploads/sites/43/2019/09/High-Road-ECJ-Brief_UPDATED-BRANDING.pdf)

<sup>51</sup> See <https://www.dir.ca.gov/Public-Works/ADA-Compliant-STW-FAQ.pdf>.

<sup>52</sup> Rulemaking ("R.") 18-12-006 at 145-147 available at 498849330.PDF (ca.gov)

<sup>53</sup> PG&E's Greenbook, available at: [https://www.pge.com/en\\_US/large-business/services/building-and-renovation/greenbook-manual-online/greenbook-manual-online.page](https://www.pge.com/en_US/large-business/services/building-and-renovation/greenbook-manual-online/greenbook-manual-online.page)

<sup>54</sup> See D.20-08-045 and D.21-04-014

<sup>55</sup> See the CEC's inaugural [AB 2127 Electric Vehicle Charging Assessment](#)

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TEAS will provide guidance to customers on what EVSE they would need to meet their operational requirements. In that process, TEAS program will make customers aware of the CPUC requirements in place for SB350 programs as outlined in AL 5695-E<sup>56</sup>, pursuant to D.18.05-040, that includes PG&E's effort to comply with the SB 350 programs to align with EVSE qualification requirements adopted in the CPUC's recent decisions. TEAS program would offer TE advisory services only and will not be conducting installations of charging equipment. Additionally, the program does not propose to own or operate the EV charging equipment.

### 6. Safety:

- a. Describe the safety requirements that are included in the proposed program.
  - i. Do the safety requirements align with the Safety Requirements Checklist adopted in D.18-01-024, D.18-05-040, and D.18-09-034?
  - ii. Does the proposed program contain safety requirements that exceed those adopted in the Safety Requirements Checklists? If so, list them and provide details on their purpose.
  - iii. How does the proposal comply with the Electric Vehicle Infrastructure Training Program requirements adopted in Assembly Bill (AB) 841 and codified in Public Utilities Code Section 740.20?

Since the TEAS program will not be performing any infrastructure installation, it does not have the ability to enforce safety requirements on customers. However, the TEAS program is committed to safety and will include safety requirements as applicable, for any third party the program would collaborate with. TEAS program would include the safety checklist<sup>57</sup> included in AL 5695-E, pursuant to D.18.05-040, that includes PG&E's effort to comply with the SB 350 programs.

The TEAS program will also provide the safety checklist to customers and third parties, particularly while advising customers on equipment selection. The TEAS program also includes the service offering of providing an opt-in list of BTM contractor to customers. In the screening questionnaire of the opt-in list, the TEAS program will ask questions about the safety requirements followed by the BTM contractors, to ensure the safety of customers.

### 7. Near-Term Priority Program Proposal: Include clear, detailed answers to the relevant near-term priority area that the proposed program seeks to target.

- a. Medium- Duty/Heavy-Duty (MD/HD)
  - i. Identify the specific state regulation(s) the proposal is responding to (e.g., California Air Resource Board's Advance Clean Fleets and Innovative Clean Transit regulations).

CARB oversees the Innovative Clean Transit (ICT) rule which was adopted in 2018 and is expected to enact the Advanced Clean Fleet (ACF) rule and regulations. The primary goal of the ACF regulation is to accelerate the market for zero-emission trucks, vans, and

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<sup>56</sup> [https://www.pge.com/tariffs/assets/pdf/adviceletter/ELEC\\_5695-E.pdf](https://www.pge.com/tariffs/assets/pdf/adviceletter/ELEC_5695-E.pdf)

<sup>57</sup> Advice Letter 5695-E: Description of PG&E's Safety Requirements Checklist Compliance Efforts for the SB350 Standard Review Projects

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buses by requiring fleets that are well suited for electrification, to transition to ZEVs where feasible.<sup>58</sup> ICT regulation requires all public transit agencies to gradually transition to a 100 percent ZEB fleet. Beginning in 2029, 100 percent of new purchases by transit agencies must be ZEBs, with a goal for full transition by 2040.<sup>59</sup>

- ii. Describe why previously approved MD/HD sector programs are insufficient to meet the needs this program proposal seeks to address, and why there are gaps in Electrical Corporation's existing MD/HD electrification program offerings.

PG&E believes that a program for providing TE advisory services to fleets, in addition to the EV Fleet program already existing at PG&E, is necessary. The Program value proposition and overview section of this document describes in detail how why PG&E's EV Fleet program for MHD vehicles is not sufficient to meet the needs the TEAS proposal seeks to address. This reasoning is also provided below for reference.

Customers were interested in participating in the EV Fleet program but weren't quite ready to electrify and were looking to PG&E to provide information that would allow them to finalize their electrification plan decisions. A program such as TEAS is needed to help bridge that gap and this comprehensive support is not something that we offer in the EV Fleet program.

Following are some of the gaps observed in the EV Fleet program:

- Delays in signing customer contracts: The EV Fleet program has experienced high cycle times from the date an application is received until the date the contract is fully executed, an average of 204 days. The reasons behind these long timelines are varied but are generally driven by customer decision-making. To get the contract signed, the customer needs to have finalized the number of vehicles, the number and type of chargers, and the location where the infrastructure would be installed. The program has observed that many customers are hesitant to commit to a plan or request changes once a plan has been developed. Even once a contract is issued, a customer still must obtain buy-in from key decision-makers in their organization and provide evidence of their commitment to electrify at least two vehicles by showing proof of purchase for at least one vehicle or a grant award letter or a letter the board authorizing budget for this. Hence a TE advisory program that would address these needs by providing fleet electrification planning guidance would help customers reduce this cycle time. Using TEAS, the customer would be able better decide what site design works best for them, be more likely to obtain grant funding, and be able to put together a demonstrated cost benefit analysis to persuade decision makers to electrify based on TCO and payback analysis.
- Attrition rates: The EV Fleet Program has experienced attrition of 20% for applications and 5% for signed contracts. Although part of attrition is due to sites that are found to

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<sup>58</sup> CA Air Resources Board's Advanced Clean Fleets Regulation. Available at: <https://ww2.arb.ca.gov/resources/fact-sheets/advanced-clean-fleets-regulation-summary>

<sup>59</sup> CA Air Resources Board's Innovative Clean Transit Regulation. Available at: <https://ww2.arb.ca.gov/resources/fact-sheets/innovative-clean-transit-ict-regulation-fact-sheet>

## Near-Term Priorities Advice Letter Template

be ineligible for the program, EV Fleet has observed other reasons that sites drop out, including: high behind-the-meter (BTM) costs, lack of dedicated personnel available at the customer's organization, customer inability to secure a BTM contractor, losing grants, customer inability to procure EVs, customer challenges obtaining easements, and funding unavailability. This demonstrates that customer need help in multiple areas of TE planning and execution, including planning, implementation, and grant application assistance. A program that provides these advisory services and fills these gaps would certainly be beneficial for reducing the customer attrition rates, and help customers complete their TE projects.

- BTM construction delays: PG&E's EV Fleet program has observed high cycle times from executing the contract to completing the construction of 435 days and that schools, especially the ones located in underserved communities, experience significant construction delays and take the longest to execute their EV Fleet projects. Of the schools located in underserved communities with signed contracts, 39% have been waiting to construct for 18 months or longer due to customer-driven challenges, compared to only 14% for the program overall. Schools find it difficult to conduct a Request for Proposal (RFP) for BTM design and construction and to find qualified BTM contractors. They also have issues obtaining funding to construct the BTM because that requires School Board approval. Hence, a TE advisory program that helps with BTM contractor selection and with obtaining funding through grants will help customers initiate an EV project, and lead to successful deployment of their BTM construction, resulting in high customer satisfaction.
- Customers applying for grants: EV Fleet program data shows that 56 percent of customers applied for grants. 22 out of 24 schools and 11 out of 16 transit agencies located in underserved communities have applied for grants. This shows that customers are very much in need of securing external funding for covering the costs of TE. Additionally, the unavailability of TE grant or funding also contributed to customer attrition. A program that provides assistance to customers for researching grant opportunities and preparing grant applications will help customers cover the costs of EVs and BTM infrastructure and remove a major barrier to TE.
- Peak time charging: EV Fleet's Year 2021 evaluation stated that "the grid impacts analysis revealed that approximately 40% of school bus charging sessions impacted electricity consumption during peak hours, when rates were highest. The grid impacts analysis also showed that school bus charging could be shifted away from peak hours." Charging at peak times leads to higher fueling costs and diminishes the benefits of fleet electrification. This shows that customers may lack education on when to charge their EVs and may also be unaware of the different rates available from PG&E that could improve fleet cost effectiveness. Therefore, a program that would educate customers on various opportunities of cost-savings post-electrification would bring substantial value to customers and well as for managing grid operations.

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It is evident that though PG&E has a program to provide TE services to MHD Fleets, the program has multiple gaps related to TE guidance, planning, implementation and as a result customers are unable to initiate, complete or operate their TE projects efficiently and cost-effectively. Hence, a comprehensive program that would provide guidance on TE advisory services that would provide planning, implementation, grant-writing and post-energization guidance is necessary to advance TE for MHD fleets. The TEAS program aims to help underserved communities by providing comprehensive TE advisory services to schools, small businesses (especially last-mile delivery services)<sup>60</sup>, and transit agency customers located in these communities.

- iii. Identify the challenges and barriers within the existing MD/HD programs and describe how the proposal addresses these barriers.

The lessons learned from PG&E's EV Fleet program were the reason to develop the TEAS program. As mentioned in the above question, customers were interested in participating in the program but weren't quite ready to electrify and were looking to PG&E to provide information that would allow them to finalize their electrification plan decisions. A program such as TEAS is really needed to help bridge that gap and this comprehensive support is not something that we offer in the EV Fleet program.

Based on the gaps observed in the EV Fleet program as described in detail in the program overview section of this document, below are the lessons learned and how TEAS program would address them:

- Customers are interested in applying for grants. Customers also end up leaving the EV Fleet program if they do not have sufficient funds for TE projects.
  - TEAS program would offer grant writing service that would prepare grant applications for customers. These grants, if received, should cover the various costs related to TE.
- Customers face challenges finding BTM contractors. Projects are delayed in construction pipelines for hundreds of days.
  - TEAS program would offer an implementation an opt-in list of BTM contractors which customers can use to find BTM contractors located in their areas.
- Customers face challenges with planning and finalizing TE projects. This creates delays getting buy-ins from their stakeholders and delays contracts signing with EV Fleet program.
  - TEAS program would offer TE planning service that would include TE cost analysis, emission reduction benefits, EV and EVSE options and availability.
- Customers lack dedicated staff for their TE projects. This causes delays in planning and implementing their projects.

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<sup>60</sup> Businesses are categorized internally by PG&E based on their usage and revenue. TEAS program would collaborate with PG&E's internal teams to determine whether customers fall in the small/micro business categories.

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- TEAS program would provide a dedicated TE advisor to customers who would walk them through all the services available, help them select services based on their TE needs, and remain as a point of contact as they receive the selected services.
- Customers face challenges after energization. This includes lack of charger operation knowledge and lack of education on different rates based on charging times.
  - TEAS program would offer post-energization guidance services that would include BEV rates and load management guidance, as well as guidance about operating and maintaining EVSE.

**Attachment A****Costs & Workpapers<sup>61</sup>****Table 1.a: TEAS Budget Summary – Administration (\$M)**

| Description  | 2024          | 2025          | 2026          | 2027          | Total         |
|--|---------------|---------------|---------------|---------------|---------------|
| Customer Acquisition & Engagement - General Internal Labor | \$0.39        | \$0.39        | \$0.39        | \$0.06        | <b>\$1.24</b> |
| Program Management Office Support – Internal Labor         | 0.13          | 0.13          | 0.13          | 0.13          | <b>0.50</b>   |
| Program Communications                                     | 0.02          | 0.02          | 0.02          | 0.00          | <b>0.05</b>   |
| <b>Total</b>   | <b>\$0.54</b> | <b>\$0.54</b> | <b>\$0.54</b> | <b>\$0.18</b> | <b>\$1.79</b> |

**Table 1.b: TEAS Budget Summary – IT (\$M)**

| Description                  | 2024          | 2025          | 2026          | 2027          | Total         |
|------------------------------|---------------|---------------|---------------|---------------|---------------|
| Initial Build                | \$0.16        | \$0.00        | \$0.00        | \$0.00        | <b>\$0.16</b> |
| Enhancements                 | 0.13          | 0.11          | 0.05          | 0.00          | <b>0.29</b>   |
| Tech Enablement Support      | 0.03          | 0.03          | 0.02          | 0.00          | <b>0.08</b>   |
| Licenses                     | 0.02          | 0.02          | 0.02          | 0.02          | <b>0.07</b>   |
| Ongoing O&M                  | 0.02          | 0.02          | 0.02          | 0.02          | <b>0.09</b>   |
| PMO Support – Internal Labor | 0.06          | 0.04          | 0.04          | 0.01          | <b>0.15</b>   |
| <b>Total</b>                 | <b>\$0.43</b> | <b>\$0.21</b> | <b>\$0.15</b> | <b>\$0.05</b> | <b>\$0.85</b> |

**Table 1.c: TEAS Budget Summary – Customer Acquisition & Engagement (\$M)**

| Description  | 2024          | 2025          | 2026          | 2027          | Total         |
|--|---------------|---------------|---------------|---------------|---------------|
| Customer Acquisition & Engagement – General Internal Labor | \$0.92        | \$0.92        | \$0.92        | \$0.13        | <b>\$2.89</b> |
| <b>Total</b>   | <b>\$0.92</b> | <b>\$0.92</b> | <b>\$0.92</b> | <b>\$0.13</b> | <b>\$2.89</b> |

**Table 1.d: TEAS Budget Summary – ME&O (\$M)**

| Description        | 2024          | 2025          | 2026          | 2027          | Total         |
|--------------------|---------------|---------------|---------------|---------------|---------------|
| Digital Media      | \$0.09        | \$0.09        | \$0.09        | \$0.00        | <b>\$0.28</b> |
| Email Outreach     | 0.02          | 0.02          | 0.02          | 0.00          | <b>0.06</b>   |
| Marketing Creative | 0.01          | 0.01          | 0.01          | 0.00          | <b>0.04</b>   |
| Labor              | 0.04          | 0.04          | 0.04          | 0.00          | <b>0.12</b>   |
| <b>Total</b>       | <b>\$0.17</b> | <b>\$0.17</b> | <b>\$0.17</b> | <b>\$0.00</b> | <b>\$0.50</b> |

<sup>61</sup> Totals may differ due to rounding.

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**Table 1.e: TEAS Budget Summary – Community Outreach (\$M)**

| Description        | 2024          | 2025          | 2026          | 2027          | Total         |
|--------------------|---------------|---------------|---------------|---------------|---------------|
| Community Outreach | \$0.40        | \$0.40        | \$0.40        | \$0.00        | <b>\$1.20</b> |
| <b>Total</b>       | <b>\$0.40</b> | <b>\$0.40</b> | <b>\$0.40</b> | <b>\$0.00</b> | <b>\$1.20</b> |

**Table 1.f: TEAS Budget Summary – Business Energy Solutions (\$M)**

| Description               | 2024          | 2025          | 2026          | 2027          | Total         |
|---------------------------|---------------|---------------|---------------|---------------|---------------|
| Business Energy Solutions | \$0.05        | \$0.05        | \$0.05        | \$0.00        | <b>\$0.15</b> |
| <b>Total</b>              | <b>\$0.05</b> | <b>\$0.05</b> | <b>\$0.05</b> | <b>\$0.00</b> | <b>\$0.15</b> |

**Table 1.g: TEAS Budget Summary – Web Services (\$M)**

| Description                                    | 2024          | 2025          | 2026          | 2027          | Total         |
|--|---------------|---------------|---------------|---------------|---------------|
| EV Savings Calculator – Enhancement Costs      | \$0.26        | \$0.03        | \$0.03        | \$0.00        | <b>\$0.33</b> |
| EV Savings Calculator – O&M Costs              | 0.16          | 0.16          | 0.16          | 0.00          | <b>0.47</b>   |
| EV Savings Calculator – Internal Labor Support | 0.01          | 0.00          | 0.00          | 0.00          | <b>0.01</b>   |
| Webpage Development                            | 0.02          | 0.00          | 0.00          | 0.00          | <b>0.02</b>   |
| TE Guidebook – Internal Labor                  | 0.01          | 0.00          | 0.00          | 0.00          | <b>0.01</b>   |
| <b>Total</b>                                   | <b>\$0.45</b> | <b>\$0.19</b> | <b>\$0.19</b> | <b>\$0.00</b> | <b>\$0.84</b> |

**Table 1.h: TEAS Budget Summary – Fleet Electrification Planning (\$M)**

| Description                    | 2024          | 2025          | 2026          | 2027          | Total         |
|--------------------------------|---------------|---------------|---------------|---------------|---------------|
| Third-party Contract Costs     | \$1.13        | \$1.69        | \$1.69        | \$0.00        | <b>\$4.50</b> |
| TEAS Advisors – Internal Labor | 0.12          | 0.12          | 0.12          | 0.00          | <b>0.35</b>   |
| <b>Total</b>                   | <b>\$1.24</b> | <b>\$1.81</b> | <b>\$1.81</b> | <b>\$0.00</b> | <b>\$4.85</b> |

**Table 1.i: TEAS Budget Summary – Grant Writing (\$M)**

| Description                    | 2024          | 2025          | 2026          | 2027          | Total         |
|--------------------------------|---------------|---------------|---------------|---------------|---------------|
| Third-party Contract Costs     | \$0.75        | \$1.13        | \$1.13        | \$0.00        | <b>\$3.00</b> |
| TEAS Advisors – Internal Labor | 0.04          | 0.04          | 0.04          | 0.00          | <b>0.11</b>   |
| <b>Total</b>                   | <b>\$0.79</b> | <b>\$1.16</b> | <b>\$1.16</b> | <b>\$0.00</b> | <b>\$3.11</b> |

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**Table 1.j: TEAS Budget Summary – Implementation Coordination (\$M)**

| <b>Description</b>  | <b>2024</b>   | <b>2025</b>   | <b>2026</b>   | <b>2027</b>   | <b>Total</b>  |
|---|---------------|---------------|---------------|---------------|---------------|
| Capacity Estimation with ALM – Internal Labor               | \$0.02        | \$0.02        | \$0.02        | \$0.00        | <b>\$0.07</b> |
| Capacity Assessment – Internal Labor                        | 0.04          | 0.04          | 0.04          | 0.00          | <b>0.11</b>   |
| Capacity Assessment – Pre-assessment Costs                  | 0.49          | 0.49          | 0.49          | 0.00          | <b>1.48</b>   |
| BTM Contractor List – Internal Labor                        | 0.06          | 0.02          | 0.02          | 0.00          | <b>0.11</b>   |
| Bidirectional Charging Technology Guidance – Internal Labor | 0.01          | 0.01          | 0.01          | 0.00          | <b>0.04</b>   |
| Program Guide Document Development – Internal Labor         | 0.01          | 0.01          | 0.01          | 0.00          | <b>0.02</b>   |
| <b>Total</b>  | <b>\$0.63</b> | <b>\$0.59</b> | <b>\$0.59</b> | <b>\$0.00</b> | <b>\$1.82</b> |

**Table 1.k: TEAS Budget Summary – Post-energization Support (\$M)**

| <b>Description</b>                                  | <b>2024</b>   | <b>2025</b>   | <b>2026</b>   | <b>2027</b>   | <b>Total</b>  |
|---|---------------|---------------|---------------|---------------|---------------|
| TEAS Advisory Consultations – Internal Labor        | \$0.21        | \$0.21        | \$0.21        | \$0.00        | <b>\$0.64</b> |
| Program Guide Document Development – Internal Labor | 0.14          | 0.14          | 0.14          | 0.00          | <b>0.42</b>   |
| <b>Total</b>  | <b>\$0.35</b> | <b>\$0.35</b> | <b>\$0.35</b> | <b>\$0.00</b> | <b>\$1.06</b> |

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**Attachment B**

**Outreach List**

| <b>Organizations</b>   | <b>Date of Outreach</b>                       |
|--|---|
| Humboldt Transit Authority                                     | 4/7/2022                                      |
| Franklin-McKinley School District                              | 4/27/2022                                     |
| Tried & True Delivery Inc                                      | 4/7/2022                                      |
| Golden Empire Transit  | 4/19/2022                                     |
| Pinecone Lumber Co   | 5/5/2022                                      |
| Boardwalk Auto Mall  | 5/5/2022                                      |
| San Joaquin Air Pollution District                             | 12/5/2022                                     |
| City of Atwater  | 12/12/2022                                    |
| Contra Costa County  | 12/16/2022                                    |
| Butte County and Butte County of Governments                   | 12/16/2022                                    |
| City of Walnut Creek   | 12/20/2022                                    |
| City of Anderson   | 12/22/2022                                    |
| Environmental Defense Fund                                     | 12/13/2022                                    |
| Graton Rancheria, Kashia/Stewarts Point Rancheria, Karuk Tribe | 12/14/2022                                    |
| Central Coast Energy Services                                  | 12/19/2022                                    |
| Acterra  | C-PAC Q2 – 6/9/2022                           |
| Multicultural Center of Marin                                  | C-PAC Q4 – 12/8/2022                          |
| Valley Clean Air Now   | C-PAC Q2 – 6/9/2022 &<br>C-PAC Q4 – 12/8/2022 |
| Fresno Economic Opportunities Commission                       | C-PAC Q2 – 6/9/2022 &<br>C-PAC Q4 – 12/8/2022 |
| Community Housing Opportunities Corporation                    | C-PAC Q2 – 6/9/2022 &<br>C-PAC Q4 – 12/8/2022 |
| GRID Alternatives North Valley                                 | C-PAC Q2 – 6/9/2022 &<br>C-PAC Q4 – 12/8/2022 |
| Veterans in Business Network                                   | C-PAC Q2 – 6/9/2022 &<br>C-PAC Q4 – 12/8/2022 |
| Self-Help Enterprises  | C-PAC Q2 – 6/9/2022 &<br>C-PAC Q4 – 12/8/2022 |

**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  
Downey Brand LLP  
Dish Wireless L.L.C.

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

GenOn Energy, Inc.  
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