

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

Application of San Diego Gas & Electric
Company (U 902 E) For Approval of its Electric
Vehicle-Grid Integration Pilot Program.

A. 14-04-014
(Filed April 11, 2014)

**PROTEST OF UTILITY CONSUMERS' ACTION NETWORK (UCAN) OF SAN DIEGO GAS & ELECTRIC
COMPANY'S APPLICATION FOR AUTHORITY TO IMPLEMENT A PILOT PROGRAM FOR ELECTRIC
VEHICL GRID INTEGRATION**

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I. INTRODUCTION

Pursuant to Rule 2.6 of the Commission's Rules of Practice and Procedure, UCAN hereby protests this application. On April 11, 2014 San Diego Gas and Electric (SDG&E) filed an application for approval for an Electric Vehicle Grid Integration Pilot program. Through this application SDG&E seeks to, among other things, contract with third parties to build, install, operate and maintain Electric Vehicle (EV) charging facilities. The proposal as presented will cost the ratepayers \$59,218,000 through 2018 in capital expenditures and over \$100,000,000 for all services over the life of the pilot.

SDG&E expects that this program will positively impact the growth of EV charging markets as well as increase the adoption of Electric Vehicles. While UCAN supports policies and projects that help build EV infrastructure, UCAN is very concerned about the costs of this proposal to the ratepayer. UCAN is also concerned about the way SDG&E seeks to build EV charging infrastructure. SDG&E seeks to be market participant by owning, building and operating EV charging facilities (utilizing third party vendors to the greatest extent possible) without a showing that the EV charging market is not developing or is experiencing market failure so that it is now necessary to use ratepayer funds.

II. GROUNDS FOR PROTEST

Through this application SDG&E hopes to build infrastructure to support the growth of Electric Vehicle use in San Diego. SDG&E proposes over the next 4 years to install 550 charging stations, at substantial cost to their ratepayers, in locations that will benefit EV customers who have access to private properties.¹ The justifications used by SDG&E for ratepayer funds for this application are:

¹ SDG&E proposes to install these EV charging stations at worksites and multi-family dwelling units in San Diego. Only those EV owners who have access to the property would therefore benefit from the use of any EV charging stations installed by SDG&E under this proposal. At a recent SDG&E forum on the this application, SDG&E personnel confirmed that these charging stations would be for "private" use, as defined above.

“Ratepayer interests are served by increased environmental benefits, GHG reductions, and increased alternative fuel use; thus the VGI Pilot Program’s support of EV growth in sustainable, grid-friendly manner serves ratepayer interests.”²

UCAN would point out that while the ratepayers may receive “increased environmental benefits” it is the EV owners, businesses who would be able to offer charging services to its employees and patrons, and apartment owners whose tenants will benefit that should shoulder the costs of this proposal. SDG&E has not shown in this application why ratepayers should shoulder the financial burden of building, maintaining and operating these charging stations. SDG&E puts forward no information in this application that the market for charging station operators is failing or that there is a need for a regulated utility to enter the market using ratepayer funds.

UCAN seeks justification why the participants who would receive the direct benefits from this proposal, (the EV owner, charging station user and the business and apartment unit owners) should be subsidized by all of SDG&E’s other customers. UCAN would like to know what information has SDG&E gathered, other than its own observation and surveys from its own company employees, about EV owner’s accessibility to charging stations presently in place? Has SDG&E determined the number of charging stations presently in place in San Diego, or researched how many more are planned for installation in the near future? Has there been an examination of how much an EV owner would pay for charging their vehicle relative to the costs of building, operating and maintaining the stations? The Commission should carefully examine the benefits received by the users this proposal as compared to the high costs to the ratepayers who receive only tangential benefits.

UCAN understands that part of this application seeks to determine how to price the energy consumed by EV users, and to manage the load on the electric grid. This goal however, can be reached without SDG&E building 550 charging stations, at a cost of more that \$59 million over the next 4 years, with ratepayer dollars. UCAN would ask that the CPUC examine the issue of could SDG&E contract with market participants to determine this by contracting

² Testimony of Lee Krevat, pg 2

with charging stations, where the station owners charge variable rates for the times of day a customer may need charging services.

III. EFFECT OF THE APPLICATION ON THE PROTESTANT

UCAN is a non-profit consumer advocacy organization, and has a long history of representing the interests of SDG&E's residential and small commercial customers before this Commission. UCAN's articles of incorporation and bylaws authorize our representation of the interests of residential and customers. The instant application affects the interests of SDG&E's residential and small commercial ratepayers, whose interests UCAN represents.

IV. NEED FOR EVIDENTIARY HEARINGS

The application put forward by SDG&E will require evidentiary hearings, and UCAN intends to participate actively participate in all aspects of this proceeding.

V. SCHEDULE

UCAN believes that the schedule proposed by SDG&E is unnecessarily restrictive to allow for a thorough examination of the important issues raised in this application. UCAN believes that more time is needed and requests that the Commission extend the time for this proceeding from what SDG&E has proposed. SDG&E has proposed that a prehearing conference be held on May 30, 2014, and that intervenor testimony be due on July 7, 2014. Following this schedule, intervenor testimony will be due very shortly after a scoping memo, which would identify the issues to be covered in testimony, is made. This is unduly restrictive, and unnecessary. UCAN would ask that intervenor testimony be due in September, and that hearings and briefings be held thereafter.

VI. COMMUNICATIONS FOR SERVICE

For the purpose of receipt of all correspondence, UCAN's representative shall be:
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UCAN also asks to be placed on the service list as an active party.

Respectfully submitted,

/s/ Donald Kelly

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