APPLICATION OF SAN DIEGO GAS & ELECTRIC COMPANY (U902E) FOR APPROVAL OF ITS ELECTRIC VEHICLE-GRID INTEGRATION PILOT PROGRAM. A.14-04-014 (FILED APRIL 11, 2014)

AND RELATED MATTER. R.13-11-007

RESPONSE OF THE CALIFORNIA ENERGY STORAGE ALLIANCE ON MARIN CLEAN ENERGY MOTION TO CONSOLIDATE PROCEEDINGS

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March 25, 2015
BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

Application of SAN DIEGO GAS & ELECTRIC COMPANY (U902E) for Approval of its Electric Vehicle-Grid Integration Pilot Program.

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

And Related Matter.

R.13-11-007

RESPONS OF THE CALIFORNIA ENERGY STORAGE ALLIANCE ON MARIN CLEAN ENERGY MOTION TO CONSOLIDATE PROCEEDINGS

In accordance with the California Public Utilities Commission’s (“Commission’s”) Rules of Practice and Procedure, the California Energy Storage Alliance (“CESA”)\(^1\) hereby submits


this response on the *Marin Clean Energy Motion to Consolidate Proceedings*, filed March 2, 2015 (“Motion”).

The Commission should grant the Motion as it relates to consolidating PG&E’s Application, but should deny the Motion as it relates to SCE’s Pilot Program (Phase 1 of their Application).

CESA believes the PG&E and SDG&E application (the latter of which was already consolidated) share many characteristics. The most important of attribute they share is that both proposals would fundamentally alter the traditional role of the utility in the competitive market for energy services. There are numerous programmatic issues that need to be prioritized as part of a new phase in the AFV rulemaking prior to proceeding with review of the PG&E and SDG&E applications. Those issues include but are not limited to:

1. Policies and programmatic messaging to signal to the market that California intends to preserve a competitive market for EV charging
2. Marketing education and outreach
3. EVSE site selection
4. Net benefits to ratepayers
5. Preservation of customer and service provider options for vehicle grid integration and enhanced grid benefits.
6. Coordination with the Distribution Resources Plan proceeding and the Integrated Demand Side Management proceeding.

SCE’s pilot program does not propose a similar shift in the role of the utility. Therefore, the pilot program presents a far narrower set of issues that would need to be addressed during the course of the proceeding, and we therefore believe there is a much higher probability of
achieving stakeholder consensus around the SCE’s pilot program without first being informed by the programmatic level questions that the AFV rulemaking intends to address. We therefore request that a decision on consolidating the pilot program in the SCE Application, at a minimum, be deferred to allow time for substantive stakeholder discussions to take place.

CESA urges the Commission to accept CESA’s recommendations for the reasons stated herein, and thus grant the Motion as it applies to PG&E’s Application and reject the Motion as it relates to SCE’s pilot program.

Respectfully submitted,

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Date: March 25, 2015