

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

**INFORMAL COMMENTS OF PACIFIC GAS AND ELECTRIC COMPANY  
ON THE SB350 WORKSHOP COVERING TRANSPORTATION ELECTRIFICATION  
METRICS AND METHODOLOGIES FOR PROGRAM EVALUATION**

May 30, 2019

## **I. Introduction**

Decisions D.18-01-024, D.18-05.040, and D.18-09-034 adopted data collection and reporting templates that all six investor owned utilities (IOU) should endeavor to complete for each of the SB 350 transportation electrification (TE) programs authorized by the California Public Utilities Commission (Commission).<sup>1</sup> On May 9, 2019, Energy Division hosted a workshop at the Commission’s San Francisco office to discuss the data collection, reporting, metrics, and evaluation methodologies for the California IOUs’ TE programs. The specific goals of this workshop were to:

1. Finalize the key research questions related to the IOUs’ initial SB 350 TE investments.
2. Review and improve the efficacy of current data collection efforts related to SB 350 TE programs.
3. Identify evaluation metrics and methodologies that can best determine the most “successful” IOU TE programs (for example, \$/GHG reduction, \$/incremental EV adoption, \$/kWh load shift, etc.)
4. Identify data and reporting gaps and strategies to fill them.

In response to Energy Division’s invitation to provide informal post-workshop comments, PG&E provides the following.

## **II. Comments to the Workshop on SB 350 TE Metrics and Methodologies for Program Evaluation**

**A. The early nature of TE activities will make it difficult to measure incremental adoption in the near term and should focus instead on lessons learned.**

PG&E appreciates the desire of the Commission and other stakeholders to determine how best to measure incremental adoption and emissions reductions resulting from the IOUs’ transportation electrification activities. Several presenters at the workshop emphasized that many

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<sup>1</sup> The data collection and reporting templates are available at [www.cpuc.ca.gov/sb350te](http://www.cpuc.ca.gov/sb350te).

factors can influence EV adoption and that the IOUs' current TE activities are pilots testing technologies that are still in the early stages of technology development. As a result, it was unclear what the best methodologies would be to measure incremental adoption at this point. PG&E agrees with these comments that it may be too early to develop a single methodology to measure incremental benefits and that IOU investments should not be evaluated based on factors outside utility control.

Instead, PG&E believes that early evaluation efforts should focus on lessons learned that may help IOUs and stakeholders scale TE programs more broadly post the pilot phase. It is also important to keep in mind the nature of pilots, and that some of these pilots will not be able to scale to larger programs. In many cases, these learnings will be qualitative in addition to quantitative.

**B. PG&E believes any evaluation approach should be applied at a broader portfolio level to allow for the differing nature of the pilots, programs, and market segments.**

The workshop presentations highlighted a mix of IOU activities that varied along market segment (e.g. light duty passenger vehicles, more mature medium and heavy-duty vehicles vs proprietary medium and heavy-duty vehicles that might be used at ports and airports), charging infrastructure (e.g. Level 2 vs DCFC charging infrastructure), and end-use location (e.g. disadvantaged communities). While the California Energy Commission (CEC) proposed an evaluation methodology focused on utilization, there was no clear consensus that this methodology would balance the need for access to charging infrastructure for residents in disadvantaged communities, nor that it would apply for all market segments. This highlights the difficulties of utilizing one metric or methodology to evaluate all IOU TE programs. PG&E

believes that different evaluation approaches may be needed for individual market segments, charging types, and programs. Each IOUs' TE activities should be measured at a portfolio level as each program serves a different need.

**C. Data requirements should derive from the evaluation methodology and must be balanced against the added cost and complexity of capturing the data.**

The data requirements, as currently designed, provide for a comprehensive set of data that can be utilized for program evaluation. However, PG&E recommends identifying the key questions that need to be answered from the pilots and broader standard review programs. Currently, the requirements seem geared towards quantity of data as the methodology is refined. Collecting this data adds complexity and costs. The IOUs are responsible for ensuring all required data is transmitted and that the data quality has been validated and verified. This requires appropriate resources, which will grow as the programs grow and more data is acquired. These costs accrue not only to the IOUs and ratepayers but also to end customers who may have to select more expensive chargers capable of supplying the required data. Identifying the relevant evaluation methodologies will help define which data is most valuable for collection and mitigate the need to collect data that is outside of the scope of the evaluation.

**III. Conclusion**

PG&E appreciates the Commission's leadership in clean transportation and TE and the opportunity to provide these comments related to metrics and program evaluation. PG&E encourages the Commission to focus on lessons learned in the early deployment of TE as opposed to incremental adoption and to take a portfolio approach to evaluation that considers the

differences across TE programs. Further, PG&E supports a balanced approach to data collection that takes into consideration the cost and complexity of gathering data as well as the program evaluation method. PG&E will continue to work in close coordination with the Commission on these topics and TE more broadly.