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

Application of San Diego Gas & Electric Company (U 902-E) for Approval of SB 350 Transportation Electrification Proposals.

Application 17-01-020 (Filed January 20, 2017)

And Related Matters.

Application 17-01-021 Application 17-01-022

#### PRIORITY REVIEW PROJECTS INTERIM REPORT OF SAN DIEGO GAS & ELECTRIC COMPANY (U 902-E)

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Attorney for SAN DIEGO GAS & ELECTRIC COMPANY

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#### PRIORITY REVIEW PROJECTS INTERIM REPORT OF SAN DIEGO GAS & ELECTRIC COMPANY (U 902-E)

Pursuant to Ordering Paragraph 34 of Decision ("D.") 18-01-024, San Diego Gas & Electric Company ("SDG&E") hereby submits its Priority Review Projects Interim Report ("Report"), dated January 31, 2019. The Report is attached to this filing as Appendix A.

Dated: January 31, 2019 Respectfully submitted,

/s/ John A. Pacheco

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SAN DIEGO GAS & ELECTRIC COMPANY

### **Appendix A**

San Diego Gas & Electric Priority Review Projects Interim Report January 31, 2019

# San Diego Gas & Electric Priority Review Projects Interim Report January 31, 2019

#### Project Description and Background

- a. **Goals** SDG&E's six approved priority review projects were designed to achieve the following goals:
  - facilitate rapid deployment of transportation electrification as a means to meet California's aggressive greenhouse gas ("GHG") reduction goals, thereby improving the health of all ratepayers and creating a cleaner environment;
  - fill and/or jump start sectors within the EV market not significantly developed or currently lacking sustainable infrastructure or capital investment;
  - create opportunities for private sector participation in the EV market by increasing EV-related demand (e.g., increased EV sales, increased need for charging and data collection infrastructure, increased need for a trained and qualified EV-related workforce);
  - promote market integration by facilitating safe and equitable access to
    electricity as a transportation fuel, including for those living in disadvantaged
    communities, while improving the efficient use of SDG&E's electric system;
  - provide data that will help test and measure the flexibility of EV charging loads and the degree to which the efficient integration of EV loads can yield cost savings to all customers by avoiding future utility infrastructure additions, increasing utilization of renewable resources, or more efficiently using the electric grid; and
  - provide education and outreach to residential and commercial customers currently lacking the knowledge or experience necessary to reach the conclusion that investment in EVs or EV infrastructure is economical, safe and good for the public at large.
- b. Procedural/Regulatory history SDG&E received approval from the California Public
  Utilities Commission to begin implementation of six Priority Review Projects on January
  11, 2018.
  - The Port Electrification project was approved as proposed.
  - Airport Ground Support Equipment (GSE), Electrify Local Highways, Fleet
    Delivery Services, Green Shuttle, and Dealership Incentives projects were
    approved with modifications.

#### c. Implementation timeline and milestones

- i. Port Electrification Estimated Milestones:
  - Site Enrollment: SDG&E engaged with several Port Tenants and conducted exploratory site walks with ten customers regarding the program. SDG&E is currently working with three customers including the Port of San Diego, Pasha and Dole, and continues to conduct program outreach to subscribe additional participants.

#### Design:

- a. Port of San Diego Cruise Ship Terminal Design complete
- b. Pasha Design complete
- c. Dole 60% design complete

#### Construction:

- a. Port of San Diego Cruise Ship Terminal Construction complete
- b. Pasha Construction is scheduled to start in February 2019
- c. Dole Construction is expected to start Q2 2019

#### • Closeout:

- a. Port of San Diego Cruise Ship Terminal Closeout expected Q2 2019
- b. Pasha Closeout expected Q2 2019
- c. Dole Closeout expected Q3 2019

#### ii. Airport Ground Support Equipment (GSE) Estimated Milestones:

- Site Enrollment: SDG&E and San Diego Airport Authority (the "Authority") have partnered with American Airlines to retrofit their existing chargers.
- Design: Design phase is significantly complete. Waiting for approval on the City Building and Electric Permit.
- Construction: Construction will start once permitting is completed. SDG&E is estimating mid-February 2019.
- Closeout: The charging ports will be energized at the beginning of Q2 2019 and data collection will begin so that SDG&E can file for Phase 2.

#### iii. Electrify Local Highways Estimated Milestones:

- Site Enrollment: Sites have been agreed upon by CalTrans and are in the process of permitting. We anticipate CalTrans Encroachment Permits will be issued by CalTrans in February.
- Design: Site designs are complete and are awaiting CalTrans approval.
- Construction: Construction will begin upon completion of:
  - a. CalTrans issuing Encroachment Permits
  - b. CalTrans approving site designs
  - c. Equipment tested, contracted, and ordered
- Closeout: Close out is expected in Q2 2019.

#### iv. Fleet Delivery Estimated Milestones:

 Site Enrollment: Site enrollment has been completed for three UPS locations and one Amazon location. The current enrollment results in 75 EVs and 79 EVSEs. SDG&E does not intend to enroll additional site

- hosts. Additional detail is provided below in the Barriers to Participation section.
- Design: Design phase is significantly complete. Awaiting customer sign off on final site designs.
- Construction: Construction expected to begin on all four locations in February 2019.
- Closeout: All four locations expected to be energized in Q1 2019.
   However, there may be lag time due to EV procurement by customers.

#### v. Green Shuttle Estimated Milestones:

- Site Enrollment: SDG&E engaged many customers and went into serious discussion with 17 customers about the program. This includes schools, workplaces, airport shuttles, hotel shuttles, etc. Currently SDG&E is actively working with four customers, San Diego Airport Parking (SDAP), Aladdin Parking, San Diego International Airport (SDIA), and a workplace.
- Design
  - a. SDAP Design complete
  - b. Aladdin 60% design complete
  - c. Workplace initial design complete
  - d. SDIA Initial site walk scheduled for Early February
- Construction
  - a. SDAP In construction
  - b. Aladdin Construction expected to start Q2
  - c. Workplace Construction expected to start Q2
  - d. SDIA Construction expected to start Q2
- Closeout
  - a. SDAP Closeout expected Q1
  - b. Aladdin Closeout expected Q2
  - c. Workplace Closeout expected Q2
  - d. SDIA Closeout expected Q2

#### vi. Dealership Incentives Estimated Milestones:

- Initial Pilot: Plug-In America was contracted to administer the program in Q2 2018. The program was launched in August with an initial pilot for a small set of participating dealerships and was active through December 31, 2018.
- Full Program Launch: 15 dealerships are registered to participate in the full Dealership Incentives program. At least two designated EV specialists from each dealership attended a 4-hour training session January 10<sup>th</sup> and are now eligible to submit incentive claims.

- Competition Launch: A "Top Gun" Completion will run April through
  October 2019 to promote a healthy competition and drive EV adoption
  amongst the participating dealerships. An award ceremony will follow in
  Q4 2019 to incentivize the sales force and award dealerships and sales
  people that achieved the best results in categories such as "Top Selling
  Dealership" and "Most Improved Sales Person".
- Closeout: All data and lessons learned from the program will be consolidated by Plug-In America and provided to SDG&E in Q4 2019.
- d. **Description of equipment and installation services; including the suppliers used.** (include procurement process, and any supplier diversity requirements).
  - Charging Equipment or EVSE: this equipment was purchased through a competitively bid process. Below is a list of the winning suppliers. Some projects have yet to select an EVSE, based on ongoing qualification processes.
    - Airport/Port (forklifts, GSE, MD/HD Trucks) Webasto is the EVSP for forklifts and GSE. Proprietary chargers were provided by Transpower and BYD for Pasha and Dole's grant-funded vehicles
    - Fleet Greenlots is the EVSP for both Amazon and UPS
    - Green Shuttles TBD
    - Electrify Local Highways TBD
  - ii. *Design/Engineering*: The PRPs have two active design engineering firms Asplundh and EPI. The sites are split between the two companies.
  - iii. *Construction*: The PRPs have two active Construction contractors Baker Electric and Henkels and McCoy. The sites are split between the two companies.
  - iv. *Supplier Diversity*: SDG&E encouraged its Contractor's to create diversity subcontracting plans.
- e. **Description of Project Status based on timeline and milestones above.** All programs for existing customers, with exception of Dealerships Incentives, are trending to complete construction by end of Q2 2019, with sites being operational by end of Q3 2019. Outreach is still ongoing for the Green Shuttles and the Port Electrification programs. Should new customers decide to enroll in either of the programs, the program schedules may push into Q3/Q4 of 2019.

#### • Project participants

 a. Customer outreach and engagement [Note: explain methods utility used to encourage participation by small, locally-owned, minority-owned, and women-owned businesses, and results.]

- i. Port Electrification: In conjunction to filing the application, SDG&E provided support and technical expertise to the Port of San Diego and the San Diego Port Tenants Association for several transportation electrification grant applications that would benefit various Port Tenants. Upon approval of the Port Electrification program, SDG&E targeted the tenants, including locally owned and minority owned businesses, that would be recipients of grant funded MD/HD vehicles and electric forklifts, to provide charging infrastructure support. Additionally, SDG&E conducted outreach through various channels including presentations at the Port of San Diego maritime meetings, San Diego Port Tenant Association board meeting and funding presentations, Regional Energy Working Group, etc.
- ii. Airport Ground Support Equipment (GSE): SDG&E worked closely with SDIA during the application process. The strategy around the GSE electrification project was based on a collaborative effort with SDIA. As part of Phase 1, SDG&E was authorized to retrofit existing ports. After conducting outreach to SDIA tenants, including locally owned and minority owned businesses, American Airlines was selected as the candidate for those retrofits because their existing charging equipment is outdated, less efficient, and provides no data to help guide users as to when they need to charge.
- iii. Electrify Local Highways: SDG&E worked closely with CalTrans during the application process. Most of the sites were identified prior to the application and SDG&E continues to collaborate on site design and permitting. This program is not applicable for participation by small, locally-owned, minority-owned, and women-owned businesses.
- iv. Fleet Delivery: SDG&E held a Fleet Delivery Forum on January 23, 2018. Local and national customers, vendors and EV manufacturers were invited to attend. On February 13, 2018, email communication was sent to over 70 local businesses to educate them on the Fleet Delivery project and hopefully enroll them in the pilot. In addition, internal SDG&E departments contacted several locally-owned, minority-owned and women-owned business in SDG&E's service territory. There was limited interest due to lack of EV options, the cost of EVs and the lack of locally-owned, minority-owned or women-owned entities in the delivery service business.
- v. *Green Shuttle*: SDG&E held a Green Shuttle Forum on January 23, 2018. Local customers that fit the decision requirements, vendors, and EV shuttle manufacturers were invited to attend. Local businesses include SDAP, who is participating in the program. SDG&E first reached out to any parking, hotels, or

other known fixed route shuttle providers in its service territory. SDG&E also relied on its internal resources to spread the word amongst their customers.

- vi. Dealership Incentives: The recruitment process began by sending a bulletin through the San Diego New Car Dealer Association. This electronic bulletin invited all dealers registered with the San Diego New Car Dealer Association, including small, locally-owned, minority-owned, and women-owned businesses, to apply for the PlugStar program. After receiving roughly 40 applications, SDG&E and Plug-In America considered the following criteria:
  - The dealer's EV Inventory and projected new EV models coming to market
  - In or adjacent to a DAC
  - DealerRater/Yelp Score
  - Evidence of Commitment to EVs (i.e., SDG&E event participation, community outreach, EV advocates, EVs visible for test drives, charging infrastructure)

Those who met the requirements and were approved by both SDG&E and Plug-In America, were then invited to attend the Dealership Training that was held on January 10, 2019. Those dealers who attended the training or already had two certified PlugStar EV specialists, were then officially accepted into the program.

- b. Description of customers and sites [Note: describe which sectors the customers and sites are in. Describe whether and how the EVSEs were limited to project participants or if they were publicly available and the relationship between the site host and the driver, including payment methods. Provide information about the site facilities, including whether there was existing TE infrastructure due to building codes or other investments. If applicable, include a map of site locations that is anonymized to the census tract level and can be shared publicly.]
  - i. Port Electrification: All three sites are located within the Port Tidelands. Nine forklifts were installed on the Port of San Diego Cruise Ship Terminal, for use by one of the Port Tenants Metro Cruise. With the Port of San Diego being the customer of record, the infrastructure may be used by a different tenant in the future, at the customer's discretion. A separate meter was installed as part of this project to bill for charging consumption. The Port of San Diego is the customer on record for SDG&E, and will receive a separate bill, which will be passed down to their tenant, Metro Cruise as a part of their lease agreement.

For both Dole and Pasha, charging infrastructure is being installed for use by their respective fleets of MD/HD trucks, and will not be available for use to the public. Both customers receive a direct bill from SDG&E, and the additional load will be added to their existing rate. No existing TE infrastructure was available at

either of the sites, however the current design takes into consideration the ability for the customers to scale up their electric fleet in the future.

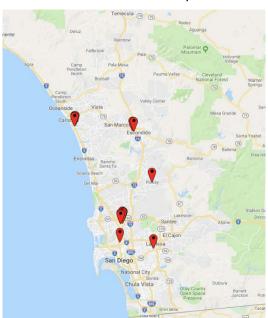
ii. Airport Ground Support Equipment (GSE): This project will be implemented in terminal 2 of San Diego International Airport (SDIA) at the following locations:

Location	Configuration	Ports
Between gates 33 and 23	3 dual-port chargers	6
Between gates 23 and 25	3 dual-port chargers	6
Between gates 35 and 34	2 dual-port chargers	4

There is existing infrastructure that will be removed and replaced with the new "smart" charging equipment. The current chargers are exclusively used by American Airlines at this time, and so will the new chargers. With SDIA being the customer of record, the infrastructure may be used by American Airlines and possibly other airlines in the future, at the customer's discretion. A separate meter was installed as part of this project to collect charging consumption information, but the energy used with be aggregated with all SDIA's consumption.

- iii. Electrify Local Highways: All sites are at publicly accessible and used park and rides. Three of the four sites do not have any existing TE infrastructure. One site was recently constructed and was built with TE make ready by a contractor hired by CalTrans. Unfortunately, the make ready that was put in place was not sufficient to meet the needs of the chargers and were not sufficiently protected from the elements after construction. This make ready will be replaced.
- iv. Fleet Delivery: All four locations support delivery operations. Three sites are UPS and one site is Amazon. The EVSEs are limited to use by the delivery entity or their contractors. The UPS locations support vehicle operations by UPS employee drivers. The Amazon location supports vehicle operations by smaller, independently owned operators known as Delivery Service Providers. UPS and Amazon will be the customer of record at their respective sites and will pay the electric utility bill to SDG&E.
- v. *Green Shuttle*: These sites are for commercial customers with fixed route shuttles:
  - San Diego Airport Parking. This customer runs an off-site airport parking
    lot and shuttles its customers to and from the Airport. This is a Power
    Your Drive and Green Shuttle site. This site is for private use and will not
    be publicly available. SDAP will be the customer of record and will be
    charged for all consumption under this new service.

- Workplace. Illumina provides shuttles to its employees to go around the
  main campus, back and forth to the north campus, and back and forth
  to University Town Center mall. This is a Power Your Drive and Green
  Shuttle site. This site is for private use and will not be publicly available.
  Illumina will be the customer of record and will be charged for all
  consumption under this new service.
- Aladdin Parking. This customer runs an off-site airport parking lot and shuttles its customers to and from the Airport. The customer has about 5 L2 charging stations that it uses as a "value added" service to customers. This site is for private use and will not be publicly available. Aladdin will be the customer of record and will be charged for all consumption under this new service.
- San Diego International Airport (SDIA), SDIA is working on procuring 4 electric shuttles for an inter-terminal route. The initial site that we are looking at would be in the current taxi/rideshare/shuttle lot. The charging stations would be open to those taxi/rideshare/shuttles, as well as service the new shuttles purchased by SDIA. At this site, the EVSP will be customer of record and billing agent of SDG&E. The EVSP will be billed for all consumption under this service point and will pass through the Public GIR rate to the drivers.
- vi. *Dealership Incentives*: There are 15 dealerships that are currently enrolled in the program, geographically situated throughout the SDG&E service territory:
  - Audi Carlsbad
  - BMW of Escondido
  - BMW of San Diego
  - Courtesy Chevrolet of San Diego
  - Quality Chevrolet of Escondido
  - Weseloh Chevrolet
  - Pacific Honda
  - Mossy Honda Lemon Grove
  - Jaguar Carlsbad
  - Weseloh Kia Carlsbad
  - Mercedes-Benz of San Diego
  - MINI of San Diego
  - Mossy Nissan Kearny Mesa
  - Porsche Carlsbad
  - Toyota of Poway



c. **Barriers to participation** [Note: Provide the number of participants that applied for the project and give a numerical breakdown of the reason they were unable to participate

(e.g., 10 percent of customers could not participate because site does not meet project requirements). Describe any barriers that prevented otherwise interested applicants from participating.]

- i. Port Electrification: Ten Port Tenants applied to participate in the program. While SDG&E had a targeted list of Port Tenants who were designated as recipients of grant funded vehicles, timing was an issue. Twenty percent of the tenants received their vehicles prior to the approval of the Priority Review Program and chose to install the infrastructure on their own. Twenty percent of the tenants chose to install the infrastructure outside of Port Tidelands, making them ineligible for the Program. The biggest obstacle has been negotiating with the customers on signing an easement/license agreement, resulting in thirty percent of customers opting out of the program. There is additional complexity for all the customers because they are Tenants of the Port, and therefore do not have jurisdiction of the land.
- ii. Airport Ground Support Equipment (GSE): On November 14, 2018 SDG&E was invited to speak at the monthly Airlines Meeting at SDIA. At the meeting, SDG&E reviewed the project's goals, phase 2, and asked the airlines to respond to a survey. The survey was designed to understand the airlines' different needs, barriers, and goals of electrifying their GSE fleet in the future. Survey results showed that infrastructure, procurement cycles, and available eGSE were the main barriers.
- iii. *Electrify Local Highways*: Although SDG&E has been working with CalTrans since before the application on these sites, more time than allocated is needed when working with government agencies due to the number of interdepartmental complexities that require input before final approval.
- iv. Fleet Delivery: Applications to the program were limited. Most of the discussions were proactively initiated by SDG&E. A potential barrier was D.18-01-024's requirement that additional participants be locally-owned, minority-owned and women-owned business. The requirement states that customers be "locally-owned business(es) or a Minority-owned Business Enterprise/Woman-owned Business Enterprise(s)". This limited the pool of potential participants. Of note, locally-owned businesses tend to be smaller and did not have a sufficiently large enough fleet to test out new vehicles (i.e., electric). In addition, vehicle procurement seemed to be a challenge for customers of all sizes. The medium-duty EV market is maturing and growing but has relatively limited options. Finally, the upfront capital cost of medium-duty EVs is a potential barrier. Discussions progressed furthest with UPS, Amazon and a small local catering company. The local catering company decided not to move forward due to being risk averse in adopting an all-electric truck for their

business operations. This resulted in Thirty-three percent of the customers not moving forward to design and construction.

- v. *Green Shuttle*: As mentioned above, SDG&E engaged 17 customers who expressed interest in the program. Unfortunately, the majority of the customers couldn't participate in the program due to following factors:
  - Customer procurement cycle not aligning with the program 30%
  - The cost of the electric shuttles still being too high 20%
  - Other customers didn't fit the fixed route profile 10%

Once we entered into contracting with the four existing customers there have been two additional barriers. One is the charging infrastructure that SDG&E was authorized to provide does not meet customer's needs. This has been addressed in a Tier 2 Advice Letter. The final barrier has been vehicle procurement and lead times. Customers are having a hard time getting the EV OEMs to commit to vehicle delivery times.

- vi. *Dealership Incentives*: The biggest barrier to program success is the requirement for the EV customers to enroll in an EV rate for the dealerships and sales staff to receive financial incentives.
- d. *Disadvantaged community participation* [Note: explain DAC participation, including how utilities selected sites, if any sites are adjacent to DACs, if there are benefits to DACs even if a project site or charging infrastructure in not in a DAC. Describe challenges and barriers to DAC participation across the different sectors of the program, as well as which sectors and outreach efforts were most successful.]
  - i. Port Electrification: Two of the three sites are in DACs.
  - ii. Airport Ground Support Equipment (GSE): The census tract for the airport is not evaluated in the CalEnviroscreen report, but it is adjacent to DACs.
  - iii. Electrify Local Highways: All four of the sites are in or adjacent to a DAC.
  - iv. Fleet Delivery: Three of the four sites are in DACs.
  - v. Green Shuttle: One of the four sites is in a DAC.
  - vi. *Dealership Incentives*: All the participating dealerships are either in or adjacent to DACs.

#### Costs

 a. Provide budget table that includes actual costs when possible. If not possible, include approved budget from original filing.

#### San Diego Gas & Electric Priority Review Projects Direct and Fully Loaded Costs Actual Costs as of December 31, 2019

	Direct Costs		Fully Loaded			
Program	Capital	O&M	Total	Capital	O&M	Total
Electrify Local Highways	390,420	66,748	457,168	461,668	143,845	605,513
Dealership Incentives	0	280,921	280,921	0	335,439	335,439
MD HD Port Electrification	214,831	49,230	264,061	275,096	106,023	381,120
Fleet Delivery Services	253,553	32,330	285,883	270,463	69,622	340,085
Taxi/Shuttle/Rideshare	59,253	40,334	99,586	120,283	86,626	206,909
Airport Ground Support Equipment	49,819	40,255	90,075	56,465	86,479	142,944
<b>Total Program Costs</b>	\$ 967,876	\$ 509,819	\$ 1,477,694	\$ 1,183,976	\$ 828,033	\$ 2,012,009

## b. Provide description of any significant variances or deviations from forecasted costs if applicable.

Variance	Impacted PRP
Not including any costs for IT for data collection	Port and Airport
functionality.	
Data Logger costs. SDG&E has worked with data loggers	Port, Fleet, Shuttle,
in the past but did not realize the difference in costs	
between a class 1 vehicle data logger (~2K/logger) and a	
data logger for medium/heavy duty vehicles (~15-	
20K/logger). In order to still get this data, we plan to	
work with Vehicle OEMs to get the telematics from the	
vehicle.	
Little to no costs were associated with Design,	Port, Shuttle
Engineering and Permitting. We had estimated costs at	
between \$0.00 and \$10K/site. SDG&E is seeing actual	
costs averaging at ~\$30K/site	
Smart Meter Installations (data collection meters).	Airport, Port
SDG&E proposed to use data collection smart meters in	
areas that have existing infrastructure. The meter	
footprint and land use rights are more than customers	
want to sign up for.	
Conduit and trench lengths were estimated on a per site	Port, Shuttle, ELH
basis. Some locations are less than the estimated	
average and some are a lot more. This is a challenge and	
has even excluded some customers from participating.	
Environmental costs were not included for the Port	Port
project. One of the projects has forecasted	
environmental costs of around \$150K, due to the	
hazardous risk of the site, raising the overall	
implementation cost to be higher than anticipated.	

Dealership Incentives did not include any internal IT	Dealership
costs to bring EV Rates into MyAccount.	Incentive
Traffic Control costs may be higher than \$2k for the	ELH
National City site if open trenching is provided. This site	
will also require paving and striping on a County road.	

- c. **Leveraged funding** [Note: include non-utility funding that supported the infrastructure installation as well as any vehicle purchases by program participants.]
  - Port Electrification: Two of the customers, Dole and Pasha, were recipients of grant-funded vehicles. These vehicles were delivered with respective proprietary chargers.
  - *Green Shuttle & Fleet*: All the vehicles for these programs were purchased by the respective customers.
  - Electrify Local Highways: N/A
  - Airport: N/A

#### Safety

- a. **Summary of relevant safety requirements**: All the Priority Review Projects adhere to the Final Safety Requirements Checklist<sup>1</sup> developed by Commission staff.
- b. Safety issues reported during project and actions taken to correct them: No safety issues reported during any of the projects to date.

#### Lessons Learned

a. **Summary Table** [Note: describe each issue that arose during the project, whether and how it was resolved during the project, and any recommendations, including those from customers, vendors, project partners, of how to address in any future implementation. Include any issues related to permitting and regulatory compliance.]

Issue	How Resolved	Recommendations
Overly prescriptive requirements –	SDG&E utilized the	Allow for broader descriptions
SDG&E went into program design within	language in the decision	in the project design when it
our testimony; not being so restrictive	that allowed for program	comes to future filings; it is
within the parameters of the design.	modifications via an	important to be flexible with
	approved Tier 2 Advice	market/customer needs.
For example: describing the exact mix of	Letter.	
chargers for each Green Shuttle site in		
testimony.		
Partnering with city/state or regulated	SDG&E worked closely	Building additional time into
entities has delayed schedules.	with these entities and	our schedule.
	understanding their	
For example: the SDIA has their own	processes during these	
processes in place, called the tenant	pilots.	
improvement process.		

<sup>&</sup>lt;sup>1</sup> www.cpuc.ca.gov/WorkArea/DownloadAsset.aspx?id=6442458882

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#### Certification:

I am an officer of San Diego Gas & Electric Company and am authorized to provide this certification on its behalf. Based on my knowledge, information and belief, I hereby certify that the statements in the foregoing report are true as stated.

Michael M. Schneider

Wellesell

Vice President, Clean Transportation & Asset Management

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