

Company: San Diego Gas & Electric Company (U 902 E)
Proceeding: Real Time Pricing Pilot Rate
Application: A.21-12-006/A.21-12-008
Exhibit: SDG&E-XX

PREPARED SUPPLEMENTAL DIRECT TESTIMONY OF
KIRSTIE C. RAAGAS (CHAPTER 2)
ON BEHALF OF SAN DIEGO GAS & ELECTRIC COMPANY

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

August 15, 2022



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1 energy exports to the electric grid from EVs, SDG&E referred to this rate as the Vehicle-to-Grid
2 (V2G)-Commodity Export rate.

3 SDG&E submitted its application for the V2G-Commodity Export rate to comply with
4 with Ordering Paragraph (OP) 9 of Decision (D.) 20-12-023, which directed SDG&E “to file an
5 application for an optional dynamic rate designed to encourage commercial EV charging.”³ On
6 April 18, 2022, Assigned Commissioner Shiroma issued a ruling consolidating A.21-12-008 with
7 SDG&E’s application for approval of a Real Time Pricing (RTP) Pilot Rate (A.21-12-006).⁴

8 On June 15, 2022, ED served a proposal recommending significant changes to the
9 eligibility, timing, and size of the RTP Pilots and V2G-Commodity Export Rate (Commodity
10 Export Pilot) (collectively, Dynamic Pricing Pilots). Those recommendations were revised on
11 July 12, 2022.⁵ In response to the revised recommendations and as explained in the
12 supplemental direct testimony of SDG&E witness Jeff Deturi (Chapter 1), SDG&E proposes to
13 implement its Dynamic Pricing Pilots in stages. My testimony addresses policy for the proposed
14 Stage 1 Export Compensation Pilot rate. Pursuant to the revised recommendations of Energy
15 Division staff filed on July 12, 2022, SDG&E anticipates expanding eligibility in Stage 2 beyond
16 commercial vehicles on the EV-HP rate. Policy Witness Jeff Deturi (Chapter 1) will address
17 policy issues related to any such expansion beyond clean transportation vehicles.

³ D.20-12-023 at 38, OP 9.

⁴ A.21-12-006, *et al.*, *Assigned Commissioner’s Scoping Memo and Ruling* (April 18, 2022)
(consolidating A.21-12-006 with A.21-12-008).

⁵ A.21-12-006 *et al.*, *Administrative Law Judge’s Ruling Addressing Motion of San Diego Gas & Electric
Company and Workshop Comments* (July 12, 2022).

1 **III. TRANSPORTATION ELECTRIFICATION POLICY**

2 SDG&E’s Export Compensation Pilot rate is intended to support California’s aggressive
3 transportation electrification and climate goals. The compensation provided by the Export
4 Compensation Pilot rate to EV customers that export energy back to the electric grid is designed
5 to support numerous state and California Public Utilities Commission (Commission) directives
6 to enable and incentivize V2G. Additionally, the proposal has the potential to increase grid
7 reliability by sending appropriate price signals that incentivize grid exports during periods of
8 peak demand for electrification.

9 The Export Compensation Pilot rate is consistent with D.20-12-023, reflects SDG&E’s
10 commitment to accelerating transportation electrification, and supports existing state
11 transportation electrification policy. It also supports California state policy and prior
12 Commission decisions that encourage expanding V2G charging. For example, Senate Bill (SB)
13 676⁶ states that it is the policy of the state and the intent of the Legislature to accelerate electric
14 vehicle grid integration (VGI), a broad category that includes bidirectional V2G charging and
15 discharging. Similarly, in D.20-12-029, the Commission found that incentivizing the export of
16 energy from EVs to the grid would help develop technologies and programs to support the grid,
17 and that it is reasonable to explore credit-for-export compensation for V2G as a near-term
18 objective for advancing VGI.⁷

⁶ SB 676, Stats. 2019-2020, Ch. 484 (Cal. 2019).

⁷ See also D.20-09-035 (clarifying that interconnection applicants from V2G customers with bidirectional direct current EV Supply Equipment (DC EVSE) may request permission to switch to bidirectional mode after completing the utility Rule 21 interconnection process).

1 **IV. CUSTOMER ELIGIBILITY FOR EXPORT COMMODITY PILOT RATE**

2 The proposed Export Compensation Pilot rate is an optional commodity credit-for-export
3 rate that sets compensation for grid exports. It does not set rates for energy imports from the
4 grid. Stage 1 of the Export Compensation Pilot rate is open to bundled customers taking
5 distribution service on Schedule EV-HP. Schedule EV-HP is an optional rate open to separately-
6 metered EV charging outside of single-family homes; non-EV load is not permitted to take
7 service under EV-HP.

8 Customers enrolling in the Export Compensation Pilot rate will be billed for energy
9 imports on their existing SDG&E commodity rates. As a commodity rate, the Export
10 Compensation Pilot rate is open to bundled SDG&E customers only. In addition, the Utility
11 Distribution Company rates (non-commodity rates) of eligible customers enrolling in the
12 proposed Stage 1 Export Compensation Pilot rate will continue to be billed through the approved
13 Schedule EV-HP.

14 Pursuant to D.20-09-035 and Resolution E-5165, Export Compensation Pilot rate
15 customers who wish to export energy to the grid must complete a Rule 21, Generating Facility
16 Interconnections agreement before having the bidirectional mode on their EVSE enabled by the
17 manufacturer or an approved third-party installer. To simplify billing and ease implementation,
18 an electric meter serving EV load engaging in V2G export under Stage 1 of the Export
19 Compensation Pilot rate is not permitted to enroll in Net Energy Metering (NEM). A customer's
20 facility meter, however, may enroll in NEM while their separate EV meter is enrolled in the
21 Export Compensation Pilot rate. Bundled customers who wish to engage in V2G grid exports
22 are not required to be compensated under the Export Compensation Pilot rate and may instead
23 receive compensation under other programs or rates offered by SDG&E.

1 Individual SDG&E transportation electrification infrastructure programs may have
2 program requirements that preclude certain sites from enrolling in the EV-HP rate and therefore
3 the proposed Export Compensation Pilot rate.

4 This concludes my prepared supplemental direct testimony.

1 **V. STATEMENT OF QUALIFICATIONS**

2 My name is Kirstie C. Raagas and my business address is 8306 Century Park Court, San
3 Diego, California 92123. I am employed by SDG&E as the Clean Transportation Business
4 Development Manager, a position I have held for approximately one and a half years. My
5 current responsibilities include oversight of clean transportation regulatory, policy, and data
6 analytics. Prior to joining the Clean Transportation department, I held positions within SDG&E
7 of increasing responsibility in the areas of Regulatory Law, Major Project Development, and
8 Regulatory Affairs.

9 I earned a bachelor of science degree in Biology from the University of California,
10 Riverside, and a juris doctor from the University of La Verne College of Law. I am an active
11 member of the State Bar of California.

12 I have not previously testified before the California Public Utilities Commission.