

**DOCKETED**

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*Comment Received From: Valerie Winn*  
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**Pacific Gas and Electric Co\_EPIC\_AB 523**

*Additional submitted attachment is included below.*

May 21, 2018

**VIA ELECTRONIC FILING**

California Energy Commission  
Dockets Office, MS-4  
Re: Docket No. 19-ERDD-01  
1516 Ninth Street  
Sacramento, CA 95814-5512

Re: Docket 19-ERDD-01: Pacific Gas and Electric Company Comments on EPIC/AB 523 Workshop

On May 8, 2018, the California Energy Commission (CEC) held a workshop to seek stakeholder input on strategies to implement the requirements of Assembly Bill 523 (AB 523, Reyes, Chapter 551, Statutes of 2017). Accordingly, PG&E provides the following comments on project prioritizations and considerations.

As noted by parties at the workshop, PG&E emphasizes the importance of prioritizing Technology, Demonstration and Deployment (TD&D) projects that benefit disadvantaged communities (DACs) or low-income communities, which is more central to the value for these communities than the location of the demonstration itself. While certain types of projects with benefits to a DAC or low-income community could be sited in the geographic region of a DAC or low-income community, there are also projects that can be executed outside of a disadvantaged community, yet offer great benefits to that community. This is particularly important for cases where a technology is not yet commercial and may carry risks that may not be aligned with the needs of DACs that are already impacted by a combination of economic, health and environmental burdens.

An example of where benefits may be realized by a DAC, but the demonstration is not located in a DAC geographic region, is related to rideshare electrification, proposed in PG&E's EPIC Project 3.42 Ridesharing Load Management. In this project, customers residing in disadvantaged and low-income communities could be supported by working directly with Transportation Network Companies (TNCs) that enable access to electric vehicles for these communities. This project may ultimately help develop rate structures and incentives that result in lower overall costs to the rideshare drivers (if they charge at optimal times) thus helping TNCs make the business case to accelerate the use of EVs rather than conventional vehicles. While the demonstration itself may be located in San Francisco or another non-DAC region, the rideshare drivers come from all parts of the Bay Area, including low-income and disadvantaged communities. Part of this project's assessment may involve determining the drivers' location, duration and frequency of driving the vehicles and the potential benefits in disadvantaged and/or low-income communities.

PG&E Comments on May 8, 2018 EPIC/AB 523 Workshop

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PG&E appreciates the opportunity to participate in this workshop and provide these comments.

Sincerely,

/s/

Valerie J. Winn