



California Energy Commission

**DOCKETED**

**12-ALT-02**

**TN # 67415**

**SEP 28 2012**

1159 Sonora Ct. #115  
Sunnyvale, CA 94086

California Energy Commission  
Dockets Office, MS-4  
Re: Docket No. 12-ALT-2  
1516 Ninth Street  
Sacramento, CA 95814-5512

September 28, 2012

**Comments of GridX, Inc. on the  
AB 118 ARFVT Program 2013-2014 Investment Plan  
Docket Number 12-ALT-2**

**Background and Summary**

GridX, Inc. is a California-based technology provider. GridX's software has been developed to solve many of the back office IT challenges utilities are facing as a result of Smart Grid and Smart Meter deployment, including those that arise due to the limitations of legacy billing and Customer Information Systems ("CIS").

The limitations of these systems and the high cost to modify and upgrade them is a critical issue limiting consumer adoption of Alternative and Renewable Fuel Vehicles, specifically Plug-In Electric Vehicles (PEVs).

More specifically, the California Public Utilities Commission (CPUC) has mandated that "submeters" used for the purpose of measuring PEV electricity usage *not* be owned by California's investor-owned utilities (IOUs). As a consequence, there is dual ownership of metering hardware – that is, the "whole premises" meter being owned by the utility and the submeter being owned by a 3<sup>rd</sup> party (e.g. PEV owner, EVSE, EVSP). The resulting dual ownership of the relevant data generated by the meters creates data management, billing, and financial clearing and settlement challenges.

As a consequence of the prohibitive time and costs to overcome these challenges, the IOUs simply cannot, implement many of the use cases defined in IOUs Joint Submetering Protocol Roadmap Report.<sup>1</sup>

As a result, EVSE's, EVSP's and others are extremely limited with respect to the business models they can pursue and the range of billing and contracting options they can offer prospective and current PEV owners. Without an ability to offer a variety of billing and contract choices to customers or without the ability to offer PEV tariffs options, at all, to certain classes of customers – those in multi-dwelling units (MDUs), for example – the pool of interested PEV purchasers is being severely limited.

---

<sup>1</sup> Submetering Protocol Roadmap Report, CPUC, Jan. 3, 2012, <http://docs.cpuc.ca.gov/efile/CF/156731.pdf>



1159 Sonora Ct. #115  
Sunnyvale, CA 94086

**Solution and Funding Opportunity**

One critical piece of missing technology is key back office IT infrastructure for utilities to support new EV-charging business models. Such technology would provide ratepayer benefits through the use of a common platform to exchange data (such as EV-charging meter data) between utilities and third party market participants. Further, such a common platform should have the capability to use the data exchanged in order to enable the billing and settlement between and among utilities, PEV owners, and EVSPs.

A common platform for data exchange not only solves many of the technical issues hampering the deployment of these business models, but also provides tremendous ratepayer benefits as it eliminates the need for redundant investment by each of the IOUs. Based on estimates, these savings would likely be in the tens of millions of dollars for California ratepayers.

Based on the ability to rapidly increase the adoption of PEVs and create a cost effective solution to an existing and growing problem, GridX strongly urges consideration of this EV Clearinghouse technology.

Sincerely,

Scott Engstrom  
V.P. Corporate Strategy & Business Development  
GridX, Inc.  
1159 Sonora Ct #115  
Sunnyvale, CA  
94086  
(925) 984-1595  
scott@gridx.com