

PUBLIC UTILITIES COMMISSION

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California Public Utilities Commission (CPUC) Energy Division staff appreciates the opportunity to submit priority issues for the Low Carbon Fuel Standard (LCFS) Advisory Panel. The following issues relate to matters under consideration in the CPUC Alternative-fueled vehicle Rulemaking (R. 09-08-009). Phase 2 of the proceeding is considering plug-in electric vehicle (PEV) rates, metering arrangements, and program issues in compliance with Public Utilities Code S 740.2.

Priority issues:

1. Electricity metering arrangements

The CPUC is considering PEV metering policy and costs in Phase 2 of R. 09-08-009. Party comments generally support the policy objective of preserving customer choice in a nascent market between available (single and separate meters) and potential metering arrangements, such as embedded meters.

2. Electricity metering functional needs

A second policy objective related to electricity metering in R. 09-08-009 is what minimum data and technological functionality will ensure that PEV metering can meet utility and customer needs.

The Commission approves accuracy and latency requirements for utility-owned meters used for customer billing. However, apart from these requirements, CARB should consider minimal functionality required for LCFS credit generation. These requirements could be different than data and accuracy standards set for “revenue grade” meters.

3. Protocol for measuring embedded carbon in electricity

ARB should elaborate on how it will calculate the carbon intensity of electricity used as a vehicle fuel. Each utility has a different carbon intensity for its portfolio. Within each utility, carbon intensity varies by season and time of year.

4. Procedural means of incorporating CPUC PEV electricity metering rules

CPUC develops and revises its metering policies on an ongoing basis in response to consumer needs and technological advances. It is important for the LCFS metering requirements to incorporate these changes when necessary.

5. Interaction of LCFS with allowance market

ARB should clarify how LCFS credits fit into ARB’s carbon allowance market.

This information does not represent the views of the CPUC or its Commissioners.