

GRIDX, INC.

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Comments of GridX, Inc. on the First Triennial Investment Plan for the Electric
Program Investment Charge (EPIC) Program
Docket Number 12-EPIC-01

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 EPIC Administrators have identified three areas of programmatic interest: (1) Clean Energy Generation Systems, (2) Grid Operation, T&D, and Electric Vehicles ("EV"), and (3) Efficiency and Demand-side Management.

In the Phase 2 decision (D. 12-05-037) of the EPIC rulemaking docket (R. 11-10-003), the CPUC provided "complementary guiding principles" that will be required attributes of the Administrators' Investment Plans (beyond the primary and mandatory guiding principle to provide electricity ratepayer benefits). These complimentary principles include, among other things, supporting "low emission vehicles/ transportation" and "efficient use of ratepayer monies". Further, the CPUC ordered that the specific activities outlined in the Administrators' plans be mappable to the utility value chain, the components of which include, among other things, "Grid operations/market design".

Regarding the program area of Grid operations/market design, more specifically, EVs, and consistent with the guiding principles outlined above, GridX urges the EPIC Plan administrators to budget for and solicit proposals that will enable more rapid adoption of EVs in the State of California. 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, EV owners, and Electric Vehicle Service Providers ("EVSP"s).

Due to the limitations of their back office IT systems, the California IOUs have acknowledged the challenges associated with implementing many of the newly contemplated EV business models.¹ By not being able to offer these new business models to consumers, EV adoption is being limited.

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

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 potential for more rapid EV adoption and for substantial cost savings for ratepayers, the development of such IT infrastructure represents the type of activity that fits into the EPIC criteria established by the CPUC and should be eligible for EPIC funding.