

March 18, 2021

CPUC Energy Division Tariff Unit
505 Van Ness Avenue
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Re: Response of the Vehicle-Grid Integration Council to Advice Letter 3705-E of San Diego Gas & Electric Company

Dear Sir or Madam:

Pursuant to the provisions of General Order 96-B, the Vehicle-Grid Integration Council (“VGIC”) hereby submits this response to the above-referenced Advice Letter 3705-E of San Diego Gas & Electric Company (“SDG&E”), *Establishment of Electric Rule 45 – Electric Vehicle Infrastructure, and the Electric Vehicle Infrastructure Rule Memorandum Account (EVIMA) in Compliance with Assembly Bill 841* (“Advice Letter”), submitted on February 26, 2021.

I. INTRODUCTION.

VGIC is a 501(c)6 membership-based advocacy group committed to advancing the role of electric vehicles (“EV”) and vehicle-grid integration (“VGI”) through policy development, education, outreach, and research. VGIC supports the transition to a decarbonized transportation and electric sector by ensuring the value from EV deployments and flexible EV charging and discharging is recognized and compensated in support of achieving a more reliable, affordable, and efficient electric grid.

II. DISCUSSION.

In reviewing the Advice Letter, VGIC supports the proposed EV Infrastructure Rule and recommends it be adopted without delay to fulfill the intent of Assembly Bill (“AB”) 841. While not objecting to the proposed EV Infrastructure Rule, VGIC notes the proposed EV Infrastructure Rule may not be fully compliant with Ordering Paragraph (“OP”) 5 of Decision (“D.”) 20-12-029, which states:

“Southern California Edison Company, San Diego Gas & Electric Company, and Pacific Gas and Electric Company shall, each, in all of its future applications for transportation electrification (TE) programs, or rule or tariff to support TE infrastructure installation:

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identify how it will deploy customer-side Automated Load Management (ALM) at host sites through such programs, rule, and/or tariff where appropriate because this technology will support TE installation at equal or lesser costs than hardware-based electrical capacity while meeting TE charging needs; and

describe its standard evaluation criteria to determine host sites where ALM would benefit ratepayers by reducing costs while meeting host site needs for electric vehicle charging.”¹

VGIC does not interpret the proposed EV Infrastructure Rule as including either (a) an identification of how it will deploy customer-side ALM where appropriate or (b) a description of a standard evaluation criteria to determine host sites where ALM would be beneficial. To the extent that the proposed EV Infrastructure Rule constitutes a “...rule or tariff to support TE infrastructure installation,”² VGIC identifies this potential inconsistency and recommends it be addressed in a future forum.

To be clear, VGIC believes the proposed EV Infrastructure Rule will meaningfully accelerate transportation electrification by significantly reducing the potential costs incurred by customers installing new EV supply equipment (“EVSE”). As such, VGIC recommends the proposed EV Infrastructure Rule be approved without delay, but reiterates the proposed EV Infrastructure Rule should be updated in the future to incorporate opportunities to encourage or incentivize ALM solutions that can potentially reduce distribution system upgrade costs. The development of strategies to promote ALM solutions and standard evaluation criteria to determine host sites where ALM would be beneficial should be discussed further with a broad set of stakeholders to work through key remaining issues before implementation. These strategies could then be included in a revised version of the EV Infrastructure Rule as an option for customers who choose to pursue ALM (but should not be a requirement).

III. CONCLUSION.

VGIC appreciates the opportunity to submit this response to SDG&E’s Advice Letter. We look forward to further collaboration with the Commission and stakeholders on this initiative.

Respectfully submitted,

/s/ Edward Burgess

Edward Burgess

Senior Policy Director

VEHICLE-GRID INTEGRATION COUNCIL

¹ D.20-12-029 OP 5.

² *Ibid.*

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