

July 5, 2021

CPUC Energy Division Tariff Unit
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Re: Response of the Vehicle-Grid Integration Council to Advice Letter 4518-E of Southern California Edison

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 4518-E of Southern California Edison Company (“SCE”), *Request for an Exemption to Public Utilities Code Section 851 and Implementation Plan for Programs and Projects Funded with Low Carbon Fuel Standard Holdback Residential Base Charging Credit and Electric Forklift Credit Proceeds* (“Advice Letter”), submitted on June 15, 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 2021-2024 Holdback Implementation Plan and recommends it be adopted without delay to fulfill the intent of Decision (“D.”) 20-12-027. VGIC is generally supportive of SCE’s proposed plan to direct \$2.6 million toward a V2B School Bus project providing backup power to a critical IT facility for Baldwin Park Unified School District (BPUSD). The Advice Letter also discusses Mid-Term Resiliency Projects,

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stating that “the ability for passenger EVs to participate in V2B or V2G activities is a longer-term opportunity for leveraging EVs as a resiliency energy source.”¹

While not objecting to the proposed Implementation Plan, VGIC believes the assertion that V2B/V2G activities is a longer-term opportunity is erroneous and should be corrected. Commercially-available bidirectional EVs and EVSE have been deployed and are in use today.² Additionally, D.20-09-035 confirmed that bidirectional EVSE can interconnect under the Rule 21 interconnection pathway.

SCE further states that: “Texas homeowners used onboard generators in pick-up trucks to heat their homes, it is anticipated that EV manufacturers will look to provide similar services. However, it is unclear what form this will take with regards to EVs.”³ VGIC notes that the recently announced Ford F-150 Lightning – available in early 2022 – will be capable of providing this service.⁴ Therefore, VGIC believes it is not merely anticipated that EV manufacturers will look to provide V2B services, but rather a demonstrated certainty that these services will be in use in the near-term.

Furthermore, SCE concludes they will reserve any unspent part of the 20% of LCFS holdback used to support resiliency and states, “this would ensure a pool of funding is available to support [V2B and V2G] market once solutions are widely available.” VGIC reiterates that solutions are available and questions the value of placing unspent funds into a reserve pool, rather than using these funds to support market development in the near-term. As such, VGIC respectfully requests SCE consider how to accelerate the use of LCFS Holdback Funds – including the anticipated unspent pool of funding – for V2B and V2G projects, and we encourage SCE to re-frame the

¹ Advice Letter Appendix A at 68.

² See, for example, Fermata <https://www.fermataenergy.com/news-press/new-partnership-combines-electric-carsharing-with-vehicle-to-grid-technology-alliance-center-colorado-carshare-fermata-energy> and Nuvve and BlueBird <https://nuvve.com/blue-bird-v2g-electric-bus-with-nuvve-and-illinois-school-districts/>.

See also announcements from ABB <https://cleantechnica.com/2020/10/14/11-kw-bi-directional-abb-chargers-coming-to-france-uk-germany-italy-belgium/>, Audi <https://electrek.co/2020/07/24/audi-bi-directional-charging-electric-cars-store-solar-energy/>, Daimler <https://www.axios.com/electric-school-buses-vehicle-to-grid-power-19f7b6b1-662b-4501-a96e-dcf3fd57a886.html>, Ford <https://www.ford.com/trucks/f150/f150-lightning/2022/?intcmp=hp-bb-f150-lightning>, Lucid Motors <https://www.autoblog.com/2020/08/19/lucid-air-ev-charging-v2g-300kw-900v-electrify-america/>, Mitsubishi <https://www.theverge.com/2019/3/6/18252883/mitsubishi-dando-drive-home-power-battery-electric-car-plug-in-hybrid>, Nissan <https://cleantechnica.com/2018/11/29/nissan-using-vehicle-to-grid-technology-to-power-us-operations/>, dcbe1 <https://cleantechnica.com/2020/08/02/ossiaco-has-built-the-one-home-solar-inverter-to-rule-them-all/>, Proterra <https://www.raconteur.net/infrastructure/v2g-school-buses/>, Rhombus Energy Solutions https://www.prweb.com/releases/rhombus_energy_solutions_announces_ul_1741sa_certification_for_its_a_c_dc_high_power_conditioning_systems_for_fleet_electric_vehicles/prweb17308158.htm, and Wallbox <https://electrek.co/2020/01/06/wallbox-quasar-tesla-nissan/>.

³ Advice Letter Appendix A at 68.

⁴ Ford Intelligent Backup Power Solution could provide backup power for up to 10 days. <https://www.ford.com/trucks/f150/f150-lightning/2022/?intcmp=hp-bb-f150-lightning>

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opportunity for V2B/V2G as a set of near-term use cases that leverage commercially-available (and in many cases, already deployed) technologies, or technologies that will become commercially available in the next 1-2 years. As such, VGIC recommends SCE submit an updated implementation plan detailing their Mid-Term Resiliency Projects (e.g., in 6 months).

VGIC thus submits this response to the Advice Letter and respectfully requests that its implementation not be unduly delayed due to the issues raised herein. VGIC offers its time and resources to Energy Division staff, Commissioners, SCE, and other stakeholders to support addressing this issue in a timely manner.

III. CONCLUSION.

VGIC appreciates the opportunity to submit this response to SCE'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

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