



October 20, 2021

CPUC Energy Division Tariff Unit
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**Re: Comments of the Vehicle Grid Integration Council to Resolution E-5165:
Approval, with Modifications, of Vehicle-to-Grid Implementation Plans and
Technical Requirements in Compliance with Decision 20-09-035**

Dear Sir or Madam:

Pursuant to General Order 96-B and the Comment Letter accompanying Draft Resolution E-5165 (“Draft Resolution”), the Vehicle Grid Integration Council (“VGIC”) respectfully comments on the proposed approval of the Joint Advice Letter 3774-E of San Diego Gas and Electric Company (“SDG&E”), Advice Letter 4510-E of Southern California Edison Company (“SCE”), and Advice Letter 6209-E of Pacific Gas and Electric Company (“PG&E”) submitted on May 28, 2021.

The proposed approval of the Joint Advice Letters represents the culmination of diligent work from stakeholders, including the investor-owned utilities (“IOUs”), that provides a critical foundation for the future of bidirectional electric vehicle charging operations (“V2G”). In particular, VGIC appreciates the IOUs’ good faith efforts and flexibility during the V2G workshops held prior to the Joint Advice Letter filings and pursuant to Decision (“D.”) 20-09-035. In approving the Joint ALs, the Draft Resolution is a symbol of progress toward widespread V2G operations and is an encouraging reflection of close collaboration between subject matter experts at the Commission, IOUs, and industry stakeholders. VGIC is pleased to see V2G DC and V2G AC implementation steps that are consistent with the needs of customers and broader V2G market development.

Specifically, the Draft Resolution includes important modifications for both V2G DC EVSE and V2G AC pathways that were highlighted in VGIC’s June 17, 2021 response to the Joint ALs. VGIC supports the modifications found in the Draft Resolution, including the clarification that V2G DC EVSE systems are not required to be certified to the UL PCS CRD if the customer seeks interconnection from the outset (as opposed to operating first in load-only or “V1G mode,” an approach that is also detailed in the Draft Resolution). VGIC is also encouraged by the establishment of lower-cost pathways for V2G AC pilots to interconnect using a trip scheme wired into the charger rather than installing a second relay. These modifications and the Draft Resolution as a whole will further unlock the safe and reliable interconnection of V2G systems. With this in

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mind, VGIC strongly recommends the Commission adopt the Draft Resolution during the November 4th voting meeting.

VGIC appreciates the opportunity to submit these comments to the Draft Resolution and looks forward to future collaboration with the Commission and IOUs on this initiative.

Respectfully submitted,

/s/ Ed Burgess

Ed Burgess

Senior Policy Director

Vehicle Grid Integration Council

cc: Kristin Landry, Energy Division (Kristin.Landry@cpuc.ca.gov)
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Service lists R.17-07-007 and R.18-12-006