

**BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF CALIFORNIA**

Order Instituting Rulemaking  
Regarding Transportation  
Electrification Policy and  
Infrastructure.

Rulemaking 23-12-008  
(Filed December 14, 2023)

**REPLY COMMENTS OF THE VEHICLE-GRID INTEGRATION COUNCIL ON THE  
ADMINISTRATIVE LAW JUDGE'S RULING REQUESTING COMMENT ON THE  
JOINT INVESTOR-OWNED UTILITIES DATA ASSESSMENTS PURSUANT TO  
DECISION 22-11-040**

Zach Woogen  
Senior Policy Manager

Albert Tapia  
Policy Analyst

**VEHICLE-GRID INTEGRATION COUNCIL**  
10265 Rockingham Dr.  
Suite#100-4061  
Sacramento, California 95827  
Telephone: (510) 665-7811  
Email: [vgicregulatory@vgicouncil.org](mailto:vgicregulatory@vgicouncil.org)

February 16, 2024

**BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF CALIFORNIA**

Order Instituting Rulemaking  
Regarding Transportation  
Electrification Policy and  
Infrastructure.

Rulemaking 23-12-008  
(Filed December 14, 2023)

**REPLY COMMENTS OF THE VEHICLE-GRID INTEGRATION COUNCIL ON THE  
ADMINISTRATIVE LAW JUDGE’S RULING REQUESTING COMMENT ON THE  
JOINT INVESTOR-OWNED UTILITIES DATA ASSESSMENTS PURSUANT TO  
DECISION 22-11-040**

In accordance with the Rules of Practice and Procedure of the California Public Utilities Commission (“Commission”), the Vehicle-Grid Integration Council (“VGIC”) hereby submits these reply comments on the *Administrative Law Judge’s Ruling Requesting Comment on the Joint Investor-Owned Utilities Data Assessments Pursuant to Decision 22-11-040* (“Ruling”), issued by Administrative Law Judge (“ALJ”) on December 27, 2023.

**I. INTRODUCTION**

VGIC commends the Commission for issuing the ruling seeking comments from parties on the Joint Investor-Owned Utilities’ (“IOUs”) Data Assessment proposal.<sup>1</sup> Decision (“D”) 22-11-040 adopted a Data Assessment structure that would capture all of the Joint IOUs’ transportation electrification (“TE”) data. In D.22-11-040, the Commission also determined that the objective of the Data Assessment is to streamline existing reporting requirements, minimize unnecessary or

---

<sup>1</sup> SDG&E Formal Proposal to CPUC on TE Reporting Requirement Streamlining. December 27, 2023. Attachment 1.

duplicative reports, and inform Funding Cycle 1.<sup>2</sup> Although VGIC did not submit opening comments February 2<sup>nd</sup>, 2024 related to TE data reporting requirements, we offer several recommendations in these reply comments, summarized below:

- VGIC opposes IOUs' proposal to "move [VGI reporting] away from numerous, detailed questions towards fewer, broader questions," as it strays too far from D.20-12-029 and subsequent decisions.
- VGIC opposes eliminating the “VGI Stocktake,” as it is a valuable tool to inform VGI initiative/portfolio development.
- VGIC generally supports Cal Advocates’ recommendation to require the IOUs to send their TE quarterly reports to all TE proceedings service lists and present the data at quarterly PAC meetings.

**II. VGIC OPPOSES IOUS' PROPOSAL TO "MOVE [VGI REPORTING] AWAY FROM NUMEROUS, DETAILED QUESTIONS TOWARDS FEWER, BROADER QUESTIONS," AS IT STRAYS TOO FAR FROM D.20-12-029 AND SUBSEQUENT DECISIONS.**

VGIC opposes the IOUs' proposed recommendation related to the VGI Report to “remove redundant and unnecessary information by moving away from numerous, detailed questions towards fewer, broader questions.”<sup>3</sup> The intent of D.20-12-029 is to collect data on IOUs' VGI initiatives and the resulting "amount" of VGI, which could include specific measurements on customer enrollment, megawatt load reduction, deployment of automated load management (“ALM”)/vehicle-to-everything (“V2X”) technologies, and other quantitative answers to "detailed

---

<sup>2</sup> CPUC D.22-11-040, *Decision on Transportation Electrification Policy and Investment*. November 17, 2022. Pg. 194.

See: <https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M499/K005/499005805.PDF>

<sup>3</sup> SDG&E Formal Proposal to CPUC on TE Reporting Requirement Streamlining. December 27, 2023. Attachment 1. Page 2.

questions."<sup>4</sup> In their proposal, the IOUs offer no justification for why their reporting should move away from numerous, detailed questions toward fewer, broader questions. VGIC urges the Commission to retain the requirement for IOUs to answer "numerous, detailed questions." Regarding exactly *which* "detailed questions" IOUs are required to answer, VGIC recommends the IOUs propose specific changes they would like to see to the list of questions and that stakeholders have an opportunity to work collaboratively to modify these questions. VGIC believes the Commission should not rule generally on whether VGI reporting should be "numerous, detailed questions" or "fewer, broader questions," but instead on precisely *which* questions ordered in D.20-12-029 should be retained, modified, or eliminated. As such, VGIC reiterates its recommendation that IOUs propose more precise questions that should be retained, modified, or eliminated, at which point parties can respond to the IOUs' proposal.

### **III. VGIC OPPOSES ELIMINATING THE “VGI STOCKTAKE,” AS IT IS A VALUABLE TOOL TO INFORM VGI INITIATIVE/PORTFOLIO DEVELOPMENT.**

The annual VGI Stocktake update required by D.20-12-029 is intended to promote general awareness of VGI programs, rates, and pilots in order to inform development of each IOUs' VGI initiatives. Specifically, the VGI Stocktake helps to ensure utility pilots are not duplicative of existing pilots or “re-piloting” technology that has already been proven, including in commercial settings. On the other hand, the VGI Stocktake serves as a repository of information that can reveal gaps in programs or pilots, thereby providing a key input into the ideation of new VGI programs,

---

<sup>4</sup> CPUC D.20-12-029, *Decision Concerning Implementation of Senate Bill 676 and Vehicle-Grid Integration Strategies*. “Energy Division staff may order the large electrical corporations to present the results of their annual reports at a workshop open to all interested stakeholders.”.

See: <https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M355/K794/355794454.PDF>

rates, pilots, or related initiatives. As such, VGIC recommends the IOUs continue annually updating the VGI Stocktake.

**IV. VGIC GENERALLY SUPPORTS CAL ADVOCATES' RECOMMENDATION TO REQUIRE TE QUARTERLY REPORTS BE SENT TO ALL TE PROCEEDINGS SERVICE LISTS AND PRESENT THE DATA AT QUARTERLY PAC MEETINGS.**

In opening comments, Cal Advocates recommends the Commission require the IOUs to send a public version of their TE quarterly reports to all TE proceedings service lists.<sup>5</sup> Furthermore, Cal Advocates recommends that “each of the IOUs present the data in the public version of the TE quarterly reports...at the current quarterly [PAC] meetings.”<sup>6</sup> Cal Advocates further recommends that “the TE quarterly reports include, for each program, data on how much money has been spent to date since the program started and how much funding remains unspent to date.”

VGIC supports Cal Advocates' recommendations to require the IOUs to send TE quarterly reports to all TE proceedings service lists and present the data at future IOU quarterly PAC meetings. VGIC believes Cal Advocates' recommendations align with the Data Collection and Reporting sections of D.20-12-029<sup>7</sup> and D.22-11-040, which deemed the structure “a reasonable methodology to inventory all IOU TE data and ensure funds are properly spent.”<sup>8</sup>

---

<sup>5</sup> Cal Advocates Opening Comments at 5.

<sup>6</sup> Cal Advocates Opening Comments at 5.

<sup>7</sup> CPUC D.20-12-029, *Decision Concerning Implementation of Senate Bill 676 and Vehicle-Grid Integration Strategies*. “Energy Division staff may order the large electrical corporations to present the results of their annual reports at a workshop open to all interested stakeholders.” Pg. 60-61.

<sup>8</sup> D.22-11-040 at 194.

V. **CONCLUSION.**

VGIC appreciates the opportunity to provide these reply comments in this proceeding. We look forward to further collaboration with the Commission and stakeholders on this initiative.

Respectfully submitted,

/s/ Zach Woogen

Zach Woogen

Senior Policy Manager

**VEHICLE-GRID INTEGRATION COUNCIL**

Date: February 16, 2024