

**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)

**PREHEARING CONFERENCE STATEMENT OF THE VEHICLE-GRID  
INTEGRATION COUNCIL ON ORDER INSTITUTING RULEMAKING REGARDING  
TRANSPORTATION ELECTRIFICATION POLICY AND INFRASTRUCTURE AND  
CLOSING RULEMAKING 18-12-006**

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February 26, 2024

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In accordance with the *Email Ruling Noticing & Resetting Prehearing Conference for Thursday, February 29, 2024 From 2:00-3:00 PM, P.S.T* (“February 8 Email Ruling”), issued on February 8, 2024 by Administrative Law Judges (“ALJ”) Marcelo Poirier and Colin Rizzo, and February 22, 2024 email instruction from ALJ Poirier granting the Vehicle-Grid Integration Council (“VGIC”) an extension until Monday, February 26, 2024, VGIC hereby submits this prehearing conference statement. VGIC reserves the right to modify or change its positions in response to the prehearing conference statements submitted by other parties and/or statements made by other parties at the prehearing conference.

**I. WHETHER THE ISSUES PRELIMINARY IDENTIFIED ARE REASONABLE AND RELEVANT.**

With the unanimous approval and subsequent launch of the Transportation Electrification (“TE”) Order Instituting Rulemaking (“OIR”) (R.23-12-008) on December 14, 2023, VGIC commended the Commission for establishing a dedicated effort to advance timely vehicle-grid integration (“VGI”) strategies as envisioned in Senate Bill (“SB”) 676 and to alleviate the growing challenges of simply “adding” – rather than *integrating* – electric vehicle (“EV”) charging load

onto the grid.<sup>1</sup> VGIC was pleased and encouraged to see VGI strategic focus areas, targets, programs, and related VGI topics included in the preliminary scope detailed in Section 3.1 of the TE OIR, and subsequently filed Opening and Reply Comments indicating the need to address VGI topics from the outset of this new TE OIR. VGIC proposed parallel Tracks in this proceeding to secure many “quick wins” and promote reasonable balance in California’s approach to advancing widespread TE.<sup>2</sup> No parties opposed VGIC’s proposal for parallel tracks and, in fact, seven parties agreed with this proposal.<sup>3</sup>

With this in mind, the preliminary scope of issues of the initial phase of this proceeding detailed in the February 8 Email Ruling represents an unexpected departure from the issues that are most urgent to California’s TE efforts. The proposed scope of the initial phase indicates a focus on *Identification of Time, Location and Size of Electric Vehicle Charging Load to Support Proactive Grid Planning and Future Generation, Distribution, and Transmission Infrastructure Deployment Needs*. VGIC appreciates the magnitude of challenges facing the Investor-Owned Utilities (“IOUs”) to support the fast-paced TE transition effectively and recognizes that proactive planning and accurate grid forecasting are important tools to address these challenges. However, VGIC posits that the narrow focus on proactive planning and load forecasting (a task already performed by the California Energy Commission’s highly capable modeling team and consultants) **risks creating an unbalanced and overly costly TE strategy that is over-reliant on difficult and expensive infrastructure deployment projects while greatly underutilizing the immense**

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<sup>1</sup> Opening Comments of VGIC on TE OIR, pg. 2.

<sup>2</sup> Opening Comments of VGIC on TE OIR, pg. 5.

<sup>3</sup> See, for example, Opening Comments of Fermata Energy at 6, Opening Comments of Kaluza at 7, Opening Comments of Joint Automakers at 8, Opening Comments of The Mobility House at 4, Center for Accessible Technology, Pacific Gas & Electric, Co., WeaveGrid, and PearlX.

**latent capacity of VGI resources**, including managed charging, bidirectional charging, and DER-paired charging.

Moreover, the sub-items listed below the initial scope issue do not contemplate meaningful strategies to support cost-efficient infrastructure deployment, including flexible service connection, load management control systems (“LCMS”), automated load management (“ALM”), limited load profiles, EV energy management systems (“EV EMS”), or any of the other related terms used to describe the critical VGI tools needed to alleviate the current pressures of fast-paced EV charger deployment. The lack of initial focus on VGI, load management, bidirectional charging, and related issues is entirely inconsistent with (a) the Commission’s stated priorities to accelerate charger deployment and reduce costs,<sup>4</sup> (b) the challenges described by utilities, for example, in Southern California Edison Company’s (“SCE”) Advice Letter 5138-E to Establish an Automated Load Management Control Systems Pilot,<sup>5</sup> (c) Cal Advocate’s emphasis on VGI and load management as a priority within this proceeding,<sup>6</sup> (d) customers’ shared experience detailed in the February 2, 2024 *Public Workshop Discussing the Development of Energization Timing Targets and Processes to Report Energization Delays*,<sup>7</sup> and (e) the clear vision of SB 676 to “maximize VGI” and the Commission’s direction in its “VGI Strategies Decision” (D.20-12-029). VGIC urges the Commission to respond directly to the increasing need for VGI solutions and scope this proceeding in corresponding tracks, as this will be fundamental to California’s EV

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<sup>4</sup> TE OIR, pg. 8.

<sup>5</sup> SCE Advice Letter 5138-E and 5138-E-A. *Establishment of Southern California Edison Company’s Customer-Site, Third Party Owned, Automated Load Control Management Systems Pilot*. Filed November 9, 2023. Approved January 16, 2024. Effective January 3, 2024.

<sup>6</sup> *Comments of The Public Advocates Office on the Preliminary Scoping Memo of the Order Instituting Rulemaking Regarding Transportation Electrification Policy and Infrastructure*. January 19, 2024. Pg. 2.

<sup>7</sup> *R.24-01-018 – Public Workshop Discussing the Development of Energization Timing Targets and Processes to Report Energization Delays*. February 2, 2024.

deployment and broader decarbonization goals, in addition to being in the best interest of all ratepayers.<sup>8</sup> Parallel tracks can support Commission decisions on VGI issues faster and more efficiently than sequenced phases. These “quick wins” on VGI issues can deliver the market transformation that the VGI and V2X industries need to scale in California, therefore applying a *force multiplier* to EV deployment.

Additionally, support for VGI solutions, including bidirectional charging and mass-market managed charging/VGI programs, is critical to reducing the future generation, distribution, and transmission infrastructure deployment needs referenced in the initial phase, offering an opportunity to save ratepayers many millions of dollars to address the critical energy affordability crisis facing consumers. However, consideration of VGI support is not initially scoped. VGIC reiterates its opening comments on the OIR, and throughout the DRIVE OIR, that *first* deploying infrastructure and *then* considering VGI strategies that could right-size investments *only after the fact* would create additional process, confusion, and most likely, unnecessary ratepayer costs.

With this in mind, VGIC respectfully urges the Commission to secure “quick wins” on a wider range of important TE topics organized into parallel Tracks, such as those detailed in VGIC’s Opening Comments on the OIR.

**II. WHETHER THE COMMISSION SHOULD INCLUDE OTHER ISSUES THAT ARE RELEVANT TO THE IDENTIFICATION OF TIME, LOCATION, AND SIZE OF ELECTRIC VEHICLE CHARGING LOAD TO SUPPORT PROACTIVE GRID PLANNING AND FUTURE GENERATION, DISTRIBUTION, AND TRANSMISSION INFRASTRUCTURE DEPLOYMENT NEEDS.**

As detailed in Section I above, VGIC believes the Commission should include VGI issues that are directly relevant to the “identification of time, location, and size of EV charging load,”

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<sup>8</sup> See, for example, *Electric Vehicles Are Driving Rates Down*. Max Baumhefner. NRDC. July 1, 2020.

including managed charging programs and rates, deployment of VGI-capable technologies to integrate EVs onto the grid (including bidirectional chargers), strategies to accelerate the energization process, and the establishment of clear VGI targets. To do this, VGIC recommends the Commission organize the array of relevant TE issues into separate, parallel Tracks, as detailed in VGIC's Opening Comments.

### **III. WHETHER THE SEQUENCING OF THE ISSUES ARE APPROPRIATE.**

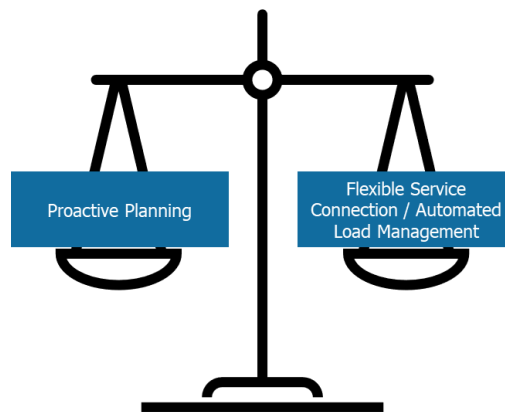
As detailed in Section I above, VGIC believes the proposed sequencing of issues is inappropriate. Rather than scoping an initial phase without consideration for other issues, VGIC recommends the Commission scope parallel Tracks to overcome time-sensitive TE barriers, secure “quick wins” for California’s decarbonization efforts, and ensure balance for ratepayers.

VGIC understands the need to develop a framework for proactive planning for EV charging load. Proactive planning will be an important tool, but it must be *balanced* with VGI strategies. This will accomplish two key goals:

- (a) **Support the array of EV charging use cases.** While proactive planning will support *some* important gaps in use cases and charging sites, for example public direct current fast charging (“DCFC”) sites, other critical TE gaps remain that are equally pressing for customers, including the “bridge to wires” approach that leverages flexible charging use cases to deploy chargers and, in turn, accelerate EV adoption, until the point in time that needed infrastructure can be planned and constructed.
- (b) **Balance ratepayer risks.** On the one hand, “proactive planning” represents a paradigm shift for utility infrastructure investment, as it authorizes investments in grid infrastructure at an earlier point in the new load process (e.g. before customers even submit service requests for new load). This could represent a risk to ratepayers as it

departs from traditional, well-established new load processes and ratemaking practices (e.g., used and useful, etc.). On the other hand, processes, programs, and frameworks to promote load management strategies that accelerate energization also represent a new set of issues for the Commission to mitigate ratepayer costs, as EV charging customers can begin consuming electricity without needing to trigger certain utility grid upgrades. Both are new strategies, yet they exist on opposite ends of the “scale” of potential ratepayer costs, illustrated below in Figure 1. Sequencing developments to pursue only one of these strategies before even considering the other would tip this “scale” and pose significant challenges to our broader TE goals as well as, critically, energy affordability for all Californians.

**Figure 1**



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**IV. WHETHER THE COMMISSION SHOULD OMIT ANY ISSUES THAT ARE NOT RELEVANT AT THIS TIME.**

VGIC offers no comment on this question. VGIC reserves the right to modify or change its positions in response to the prehearing conference statements submitted by other parties and/or statements made at the prehearing conference.

**V. CONCLUSION.**

VGIC appreciates the opportunity to provide this prehearing conference statement. 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 26, 2024