

March 22, 2024

Email to: docket@energy.ca.gov

Docket Number: 22-RENEW-01

Subject: California Energy Commission Demand Side Grid Support Program Guidelines

Re: Comments of the Vehicle Grid Integration Council on Demand Side Grid Support Program Proposed Draft Guideline.

Dear Sir or Madam:

The Vehicle-Grid Integration Council (VGIC) appreciates the opportunity to provide these comments in response to the Demand Side Grid Support (DSGS) Program Proposed Draft Guidelines, Third Edition, and the March 12, 2024, Workshop hosted by the California Energy Commission reviewing the proposed modifications to the DSGS Program Draft Guidelines. The DSGS program can unlock significant load reductions and exports to support system reliability, including during extreme weather events, from California’s 1.5 million – and counting – electric vehicles (EVs). EVs represent a low-cost resource to meet the state’s Strategic Reliability Reserves that can be deployed at scale and rapidly relative to other resources. However, to achieve this vision, the DSGS program should be enhanced as detailed below.

VGIC Strongly Supports the Revised DSGS Program Guidelines, Including the Incorporation of Vehicle-to-Everything (“V2X”) Resources into Option 3 and the Extension of the Incentive Bonus through 2025.

On slide 17 of the workshop presentation, the CEC proposes to include V2X bidirectional charging technologies in DSGS Option 3. VGIC strongly supports this modification, as bidirectional chargers are *mobile* energy storage systems that are operationally similar to the stationary energy storage systems already eligible to participate in Option 3.¹ Additionally, the CEC proposes to extend the 30% incentive bonus to program year 2025 for DSGS Option 3, which VGIC supports, as this will help spur interest in the program and reward early adopters of a valuable but underutilized solution set. VGIC commends the CEC for its continued leadership in the V2X space and believes that including V2X in DSGS Option 3 will unlock significant emergency net load reductions and exports to support system reliability.

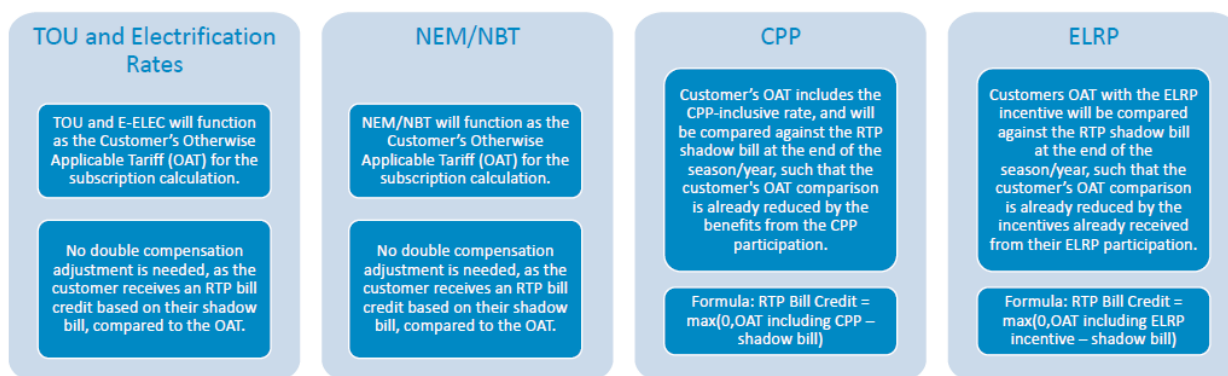
Additionally, the CEC correctly proposes to ensure UL 1741 SB certification is not required for EV supply equipment (EVSE) participating in DSGS Option 3 but must still follow all applicable

¹ In 2020, the CPUC confirmed that, for the purposes of interconnection, V2X-DC chargers *are* energy storage. See CPUC Decision 20-09-035.

permission to operate requirements set by the relevant authority. VGIC strongly supports this modification, given the lack of available UL 1741 SB-certified V2X equipment.

CEC Should Clarify Dual Participation Rules Between DSGS Option 3 and Certain CEC and Utility Programs.

The CEC proposes expanding dual participation to “critical peak pricing rate plans.” VGIC supports this expansion and recommends the CEC clarify whether dynamic rate (i.e., “CalFUSE” rate pilots) participants are eligible to dual participate in DSGS. VGIC recognizes it is critical to avoid double counting these resources to ensure DSGS success can be properly measured and evaluated and to avoid inefficient use of program budgets. Notably, the CPUC hosted a workshop on March 1st to address the issue of double counting/compensation and to discuss methodologies to implement certain types of dual participation. The below graphic demonstrates the methodology developed by PG&E to avoid double counting/compensation between dynamic pricing pilots (i.e., CalFUSE rates) and various other demand-side management measures:



Given that ELRP and DSGS are both emergency demand response programs, VGIC posits that the above graphic would look nearly identical if “ELRP” were replaced with “DSGS.” As such, VGIC recommends the CEC explicitly clarify whether dual participation is permitted between DSGS and dynamic rates, not just CPP, to allow for “value stacking” and ensure DSGS funds can be supplemented to unlock the greatest possible amount of incremental emergency capacity.

Additionally, the CEC’s Distributed Electricity Backup Assets (DEBA) solicitation concept weighs dual participation across DEBA and DSGS for certain customer participation *Pathways*. VGIC recommends that the CEC’s updated DSGS guidance also reflect this dual participation use case to avoid customer confusion.

CEC Should Consider in Future Revisions How to Account for VIG Load Reduction Within DSGS.

The CEC should consider how to account for unidirectional or “V1G” load reduction in future DSGS revisions. As California experiences consistent growth in EV deployment, using every tool in the toolkit will be critical to enable EV load flexibility. VGIC respectfully requests the CEC staff to continue collaborating with stakeholders to develop DSGS enhancements that promote greater EV participation, including in unidirectional or “V1G” mode.

Conclusion.

VGIC appreciates the opportunity to provide these comments and looks forward to collaborating with the CEC and other stakeholders in this docket.

Respectfully submitted,

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