

April 3, 2024

CPUC Energy Division Tariff Unit  
505 Van Ness Avenue  
San Francisco, California 94102  
[EDTariffUnit@cpuc.ca.gov](mailto:EDTariffUnit@cpuc.ca.gov)

**Re: Response of the Vehicle-Grid Integration Council to Advice Letter 4407-E of San Diego Gas & Electric Company.**

---

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 4407-E of San Diego Gas and Electric Company (“SDG&E”), *Implementation of Dynamic Export Rate Pilot Program Pursuant to Decision 23-11-006* (“Advice Letter”) submitted on March 14, 2024.

Decision (“D.”) 23-11-006, issued on November 15, 2023, directs SDG&E to conduct the Dynamic Export Rate Pilot for customers on Schedules EV-HP, AL-TOU, and TOU-A.<sup>1</sup> D.23-11-006 also orders SDG&E to file a Tier 2 advice letter within 120 days to implement the pilot. VGIC offers the below response to SDG&E’s Advice Letter.

**I. SDG&E should begin designing and piloting no-regrets rate elements – including those very likely to be required by upcoming guidance in R.22-07-005 – with EV-HP, AL-TOU, and TOU-A customers who are interested in taking advantage of these additional rate elements.**

D.23-11-006 directs SDG&E to establish a dynamic import rate after guidance is issued in R.22-07-005. Since the issuance of D.23-11-006, the Commission has also issued D.24-01-032, which strongly indicates – and, given the scale of funding authorized in the Decision, all but finalizes – which dynamic rate elements will be included in any upcoming guidance in R.22-07-005. D.24-01-032 authorizes up to \$36,695,000 to support the expansion of dynamic rate pilots in SCE and PG&E service territory. These dynamic rate pilots apply to both imports and exports and include marginal distribution pricing components. SDG&E’s export compensation pilot, as outlined in the Advice Letter, addresses only a dynamic export component, and it also does not include any

---

<sup>1</sup> CPUC Decision 20-09-035, *Decision Adopting Recommendations from Working Groups Two, Three, and Subgroup*. September 24, 2020.

April 3, 2024  
Page 2 of 2

distribution components. VGIC recommends SDG&E embrace the export pilot detailed in the Advice Letter as a critical opportunity to pilot dynamic import rates and distribution components (for both imports and exports) at a manageable scale before they are directed by the Commission to launch a large-scale pilot.

## **II. CONCLUSION.**

VGIC appreciates the opportunity to submit this response to SDG&E's Advice Letter. We look forward to further collaboration with the Commission and stakeholders on this initiative.

Respectfully submitted,

/s/ Zach Woogen

Zach Woogen

Interim Executive Director

**VEHICLE-GRID INTEGRATION COUNCIL**

cc: Greg Anderson  
Regulatory Tariff Manager  
Email: [GAnderson@sdge.com](mailto:GAnderson@sdge.com) and [SDGETariffs@sdge.com](mailto:SDGETariffs@sdge.com)  
Service list A.21-12-006  
Service list A.21-12-008