

May 1, 2024

Andrew S. Johnston
Executive Secretary
Maryland Public Service Commission
William Donald Schaefer Tower
6 St. Paul Street, 16th Floor
Baltimore, Maryland 21202

Re: Case No. 9478; Comments of Vehicle-Grid Integration Council on the Evaluation of Phase I Utility Programs

Dear Mr. Johnston,

Vehicle-Grid Integration Council (VGIC)¹ respectfully provides its comments in response to the Maryland Public Service Commission’s (“Commission”) April 2, 2024 Notice of Hearing (“Notice”) in Case No. 9478, regarding Evaluation of Phase I Utility Programs.

I. Introduction

VGIC is a 501(c)(6) membership-based advocacy group committed to advancing the role of electric vehicles (EVs) and vehicle-grid integration (VGI) through policy development, education, outreach, and research. VGIC supports the transition to decarbonized transportation and electric sectors by ensuring the value from EV deployments and flexible EV charging and discharging is recognized and compensated to achieve a more reliable, affordable, and efficient electric grid.

II. Comments

VGIC appreciates the continued reporting by Maryland utilities, including Baltimore Gas and Electric, Potomac Edison Company, Potomac Electric Power Company, Delmarva Power & Light, and Southern Maryland Electric Cooperative throughout the Phase I program cycle. These reports highlight the effectiveness of many of the EV programs as well as lessons learned. In VGIC’s view, the Phase I programs have met their intended goals, and the utilities should

¹ VGIC member companies and supporters include American Honda Motor Co., Inc., BorgWarner, Fermata Energy, Ford Motor Company, General Motors, Nissan Group of North America, Bidirectional Energy, Customized Energy Solutions, dcbel, Eaton Corporation, Emporia Corp., EnergyHub, EV.Energy, FreeWire Technologies, Inc., GridWiz, Kaluza, Landis + Gyr, Leapfrog Power, Inc., Nuvve Holding Corporation, Peak Power, PowerFlex, Qcells, Stellantis N.V., Sumitomo Electric, The Mobility House, Toyota Motor North America, Inc., WeaveGrid, Hoosier Energy, Peninsula Clean Energy, and Sacramento Municipal Utility District. The views expressed in these Comments are those of VGIC, and do not necessarily reflect the views of all individual VGIC member companies or supporters.
(<https://www.vgicouncil.org/>)

continue to extend and expand successful pilots and programs and develop new elements that address evolving EV charging needs, create benefits for customers and communities, and advance Maryland’s state policies focused on promoting transportation electrification and reducing greenhouse gas emission.

EV adoption continues to increase in Maryland as the total number of registered EVs is nearly 100,000.² If the electric vehicle transition is done right, the societal benefits will be significant. An M.J. Bradley study commissioned by the Union of Concerned Scientists found that accelerating the deployment of clean vehicles and fuels at scale could yield a net benefit of almost \$40 billion by 2050.³ However, the State of Maryland may not realize many of these benefits if charging is not managed and largely occurs outside the low-cost times on the grid.

One common theme seen throughout the reports is participants’ interest and willingness to charge during low-cost times. BGE has reached its enrollment cap on the home charging incentive (2,500 customers) and now has 2,654 customers on its EV-only time-of-use (TOU) rate and has effectively implemented its active managed charging demonstration with 2,804 customers enrolled, shifting charging to low forecasted PJM times and launching a new phase which focuses on distribution asset protection.⁴ For Potomac Edison, the Company has enrolled 518 customers in its EV-only time-of-use rate leveraging EVSE and telematics options for customers, where only nearly 80% of customers were satisfied with the accuracy of usage data.⁵ For Delmarva Power & Light Company and Potomac Electric Power Company (PHI Utilities), the Smart Charge Management has demonstrated a significant reduction in on-peak charging. PHI Utilities’ most recent semi-annual EV report highlights the benefits of active managed charging, where charging is automated to align with PJM signals and minimize loading on distribution assets, providing significant costs savings while further reducing non-coincident peak.⁶ In Guidehouse’s Evaluation, the key findings for each program note the general off-peak

² Maryland Department of Transportation. *Number of Registered BEVs and PHEVs by County*. March 31, 2024. Online at: <https://experience.arcgis.com/experience/d8d908d9e62f4054b14ec8f6cbb5392b/page/Dashboard-%26-Metrics/>

³ Lowell, D., A. Saha, and C. Van Atten. 2018. *Decarbonizing transportation: The benefits and costs of a clean transportation system in the Northeast and Mid-Atlantic Region*. M.J. Bradley & Associates, LLC. Online at: <https://www.ucsusa.org/sites/default/files/attach/2019/02/Cost-and-Benefits-of-Clean-Transportation-MD.pdf>

⁴ Baltimore Gas and Electric Company. *Electric Vehicle Program Phase II Proposal of Baltimore Gas and Electric Company*. May 24, 2023. Pg. 2 and Pg. 8.

⁵ The Potomac Edison Company. *EV Phase II Program Proposal of The Potomac Edison Company*. March 1, 2024. Pg. 7 and Pg. 54.

⁶ PHI Utilities. *Final Program and Semi-Annual Progress Report of Delmarva Power & Light Company and Potomac Electric Power Company Regarding Implementation of Approved Electric Vehicle Charging Program Offerings*. March 1, 2024. Pg. 19 - 24.

benefits of the utilities' programs with 80% or more of residential charging occurring during off-peak (and some with 90% or more).⁷

It is our view that a combination of passive managed charging options, like time-of-use, alongside active managed charging options, like the BGE and PHI Utilities' Smart Charge Management pilots, generate additional benefits is an important program design for providing choice so that customers can participate based on the technologies customers have as well as their preferences and mobility needs. We recommend that the Maryland PSC urge the utilities to continue to include and expand managed charging offerings in the Phase II program proposals.

Furthermore, it is our understanding that there are timing sensitivities regarding the procedural schedule, and the utilities' ability to continually implement these programs. In particular, we are concerned about managed charging offerings that are currently capped and may not be able to run continuously through January 1, 2025, and beyond.

For instance, BGE has sought to expand the program beyond its current Smart Charge Management demonstration phase to reopen enrollment in June 2024, allowing access to this expanded program.⁸ Potomac Edison has also proposed continuing their Phase I programs in a Phase II portfolio.⁹

As an industry, we are fortunate in that there have been few pilots or programs that have had a temporary discontinuance. Still, we are aware of the negative impacts of starting and stopping programs because of the experience in related technology sets. The significant progress made by the Maryland utilities with respect to EV program enrollment has been impressive, and VGIC respectfully advises against interrupting that progress. The utilities should be encouraged to extend and, where possible, expand the current offerings beyond January 1, 2025. This is critical to make the most of the significant time, resources, and dedication that Maryland EV stakeholders have put forth over the past five years.

Therefore, VGIC recommends that the Commission act urgently in developing a procedural schedule to create the opportunity for the Commission to determine that these programs are in the public interest and should be continued without major interruption.

III. Conclusion

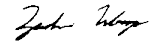
⁷ Guidehouse Inc. *Maryland Statewide Electric Vehicle Portfolio Evaluation*. February 16, 2024. Pg. 4-5.

⁸ Baltimore Gas and Electric Company. *Electric Vehicle Program Phase II Proposal of Baltimore Gas and Electric Company*. May 24, 2023. Pg. 4.

⁹ The Potomac Edison Company. *EV Phase II Program Proposal of The Potomac Edison Company*. March 1, 2024.

VGIC appreciates the opportunity to provide comments on these important issues.

Sincerely,



Zach Woogen
Interim Executive Director
Vehicle-Grid Integration Council (VGIC)
vgicregulatory@vgicouncil.org
(510) 665-7811