

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

Application of Pacific Gas and Electric Company  
(U39M) for Approval of its Proposal for a Day-Ahead  
Real Time Rate and Pilot to Evaluate Customer  
Understanding and Supporting Technology.

Application 20-10-011  
(Filed October 23, 2020)

**COMMENTS OF THE VEHICLE GRID INTEGRATION COUNCIL ON PROPOSED  
DECISION ADOPTING SETTLEMENT ON EXPORT COMPENSATION FOR  
CERTAIN PACIFIC GAS AND ELECTRIC COMPANY CUSTOMERS**

Ed Burgess  
Senior Policy Director

Zach Woogen  
Policy Manager

**Vehicle Grid Integration Council**  
10265 Rockingham Dr., Suite #100-4061  
Sacramento, CA 95827  
Telephone: (510) 665-7811  
Email: [vgicregulatory@vgicouncil.org](mailto:vgicregulatory@vgicouncil.org)

October 4, 2022

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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 comments on the *Proposed Decision Adopting Settlement on Export Compensation for Certain Pacific Gas and Electric Company (“PG&E”) Customers*, issued on September 14, 2022.

**I. INTRODUCTION.**

VGIC is a 501(c)6 membership-based advocacy group committed to advancing the role of electric vehicles (“EV”) and vehicle-grid integration (“VGI”) through policy development, education, outreach, and research. VGIC supports the transition to a decarbonized transportation and electric sector 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. VGIC SUPPORTS ALJ DOHERTY’S TIMELY APPROVAL OF THE UNCONTESTED SETTLEMENT ON EXPORT COMPENSATION.**

VGIC supports the Proposed Decision’s (“PD”) approval of the settlement agreement to establish export compensation rules for non-net energy metering (“Non-NEM”) customers taking

service under PG&E’s Day-Ahead Hourly Real-Time Pricing (“DAHRTP”) rate. As one of the four parties involved in the settlement, VGIC believes it represents meaningful progress toward maximizing VGI, as required under Senate Bill 676. Through the timely implementation of export compensation for non-NEM DAHRTP customers, PG&E can offer customers real-time export rates that may lead to reduced system costs and, in turn, prices for all ratepayers. VGIC believes the PD correctly finds the export compensation settlement agreement reasonable, lawful, and in the public interest. While other pathways for export compensation for EV customers may now or soon be available, for example, PG&E’s VGI pilots and Emergency Load Reduction Program (“ELRP”), the non-NEM DAHRTP export compensation rate offers another vital option for customers to choose from. Notably, participating EV charging customers with co-located or integrated distributed energy resources will have a unique opportunity to fully leverage their on-site devices to support the grid through exports. Moreover, the non-NEM DAHRTP export compensation rate design does not cap the amount of money a given customer can earn from providing grid exports, whereas PG&E’s VGI pilots impose a per-customer cap on upfront and ongoing performance incentives.<sup>1</sup> As such, VGIC reiterates its strong support for establishing the non-NEM DAHRTP export compensation rate in addition to PG&E’s VGI Pilots and ELRP, as these options promote customer choice, support the VGI market during this critical early stage, and can yield significant learnings about the relative benefits of different rate and program designs.

### **III. CONCLUSION.**

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

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<sup>1</sup> See PG&E’s Advice Letter 6637-E, “Justification for PG&E’s V2X Pilot 2 (Commercial Fleets Pilot).” Disposition Letter Accepting the Advice Letter was issued on August 12, 2022.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Edward Burgess". The signature is fluid and cursive, with a long horizontal stroke at the end.

Edward Burgess  
Senior Policy Director  
**Vehicle Grid Integration Council**

October 4, 2022