Comments of the Vehicle-Grid Integration Council (VGIC)

on Revised Clean Peak Standard Demand Response Guidelines

Introduction

The Vehicle-Grid Integration Council (VGIC)[1] 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 a decarbonized transportation and electric sector by ensuring the value from EV deployments and flexible EV charging and discharging is recognized and compensated in support of achieving a more reliable, affordable, and efficient electric grid. VGIC appreciates the opportunity to provide comments to the Department of Energy Resources (DOER) on the revised Demand Response (DR) Resource Guideline, particularly regarding the participation pathway for EVs and EV Supply Equipment (EVSE).

VGIC Generally Supports DOER's Approach to EV/EVSE Participation in its Demand Response Resource Guidelines

EVs are capable of system-wide load reduction through managed charging (V1G), battery discharge to serve on-site load (V2B), and exporting power to the grid (V2G). As such, EVs represent a tremendous amount of latent battery storage capacity that can be utilized to support grid needs. Overall, VGIC is encouraged by the DOER's consideration of EVs and EVSE in the Clean Peak Standard DR program, including the use of a static baseline to calculate DR performance. Based on analysis VGIC recently conducted, the proposed baseline of 35% of daily energy consumption closely matches the unmanaged EV charging load profile and would incentivize EVs to reduce charging load during the Seasonal Clean Peak Window, while avoiding cumbersome counterfactual data requirements that would discourage participation. VGIC also appreciates the DOER's decision to include and incentivize

[1] VGIC member companies and supporters include American Honda Motor Co., Inc., dcbel, Enel X North America, Inc., Fermata, LLC., Ford Motor Company, General Motors Company, Nissan North America, Inc., Nuvve Corporation, Stellantis N.V., The Mobility House, Toyota Motor North America, Inc., and Veloce Energy, Inc. 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/).

bidirectional charging, as such capabilities are commercially available and would deliver additional grid benefits compared to only load reduction via managed charging.

Additional Modifications to the Guidelines Could Further Improve EV/EVSE Participation

While DOER's Guidelines reflect a sound approach, VGIC provides the following recommendations that would further improve EVs/EVSE's ability to participate in Clean Peak Standard and support Massachusetts's clean energy goals:

- *Recommendation 1: Clarify that reporting requirements can be met via either a networked EVSE device or through EV vehicle telematics, provided that such data meets the Production Tracking System requirements, rather than requiring charging data be measured by a separate meter.* Requiring charging data be measured by a separate meter would add unnecessary costs for EV owners and deter participation. It would also fail to leverage the robust existing data collection capabilities on EVSE and EV devices. There is no need for an additional meter when EVSEs and vehicle telematics are equally capable of measuring and communicating charging data to calculate DR performance on a 15-minute interval. VGIC looks forward to working with DOER to develop appropriate interval data reporting requirements that can accommodate participation through both networked EVSE and EV telematics approaches.
- *Recommendation 2: Allow multiple EV/EVSE devices to enroll as part of an aggregation, instead of requiring every individual device to obtain a statement of qualification.* Some electric vehicle owners may prefer to allow third-party aggregators to manage their EV charging in aggregate with other EVSEs/EVs. Thus, requiring each individual EVSE/EV to obtain a statement of qualification would add unnecessary administrative costs and delay participation. Currently, aggregations of DR resources dispatched by an electric distribution company as part of a retail customer Active Demand Response program are already allowed to enroll through a single statement of qualification. To avoid discriminatory treatment of clean peak resources, VGIC believes that EV/EVSE aggregations should be afforded the same opportunity and be able to enroll through a similar aggregation pathway.
- *Recommendation 3: Allow EVs/EVSE exporting power to the grid, not only those offsetting on-site load, to earn Clean Peak Energy Certificates (CPEC).* While the revised guidelines state that energy dispatched from the vehicle can increase the number of CPECs generated, the guidelines do not make clear whether this energy dispatch includes both energy exported to serve on-site load and

energy exported to the grid. EVs and EVSE's bidirectional charging/discharging capabilities can provide grid services by exporting energy to the grid, in addition to reducing on-site load. In both cases the contribution to alleviating the system-wide peak load with a clean resource is equivalent, and as such they should be similarly compensated.

- *Recommendation 4: Clarify that EVs with vehicle to grid (V2G) capability should not be considered a form of "generation" as defined by the Demand Response Resource guidelines.* While DOER specifically excludes certain generation resources as ineligible for demand response including "backup generators, combined heat and power plants, and renewable energy generators,"[2] the guidelines are silent on how energy exported from EVs to the grid should be treated. VGIC notes that V2G exports do not technically generate any new energy, and simply shift the time in which energy is provided to the grid. As such, VGIC recommends that DOER clarify that V2G resources are not considered "generation" and thus should be eligible for full participation as a Demand Response Resource.
- *Recommendation 5: Clarify the amount of CPEC eligible kWh subject to the Actual Monthly System Peak Multiplier to be one-fourth (25%) of the total CPEC eligible kWh during a Seasonal Clean Peak Window with the Hour of Actual Monthly System Peak.* Since the Hour of Actual Monthly System Peak only occurs for one hour during a four-hour Seasonal Clean Peak Window, it is unclear how the Monthly System Peak Multiplier would interact with the static baseline for EV/EVSE DR performance. For the sake of simplicity, VGIC recommends that the Monthly System Peak Multiplier apply to 25% of the CPEC eligible kWh generated by an EV/EVSE during the Seasonal Clean Peak Window with the Hour of Actual Monthly System Peak. For example, if an EV/EVSE generates 4 CPEC eligible kWh over a Seasonal Clean Peak Window during which the Hour of Actual Monthly System Peak occurs, the number of kWh that would be eligible for the Monthly System Peak Multiplier would be 4 * 0.25 = 1 kWh.

Conclusion

VGIC appreciates the opportunity to provide these comments and looks forward to working with the DOER to ensure the success of the Clean Peak Standard DR Program.

[2] See Section 2(b) of Demand Response Resource Guidelines

Respectfully submitted,

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