



Comments of the Vehicle-Grid Integration Council (VGIC)
on the Distribution Circuit Multiplier Draft Guideline

Introduction

The Vehicle-Grid Integration Council (VGIC)¹ is a 501(c)(6) membership-based trade association focused on accelerating the role of smart electric vehicle (EV) charging and discharging 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 Massachusetts Department of Energy Resources (DOER) on the Clean Peak Standard Distribution Circuit Multiplier (DCM) Draft Guideline.

Energy Storage and Demand Response Resources Should be Eligible for the DCM

EV supply equipment (EVSE) can participate in Clean Peak Standard as either a Demand Response Resource (DRR) or a Qualified Energy Storage System (QESS). However, under DOER’s Draft Guideline, only Generation Units are eligible for the DCM and are able to reserve capacity on DCM-eligible circuits. The exclusion of other resources, including EVSE, fails to recognize their potential value in helping to mitigate distribution system upgrades. When EVSE – whether participating as a DRR or QESS – reduces charging power and/or discharges energy during the Seasonal Peak Periods under the Clean Peak Standard program, these resources help

¹ VGIC member companies and supporters include American Honda Motor Co., Inc., Customized Energy Solutions, dcbel, Enel X North America, Inc., ENGIE NA, Fermata Energy, FlexCharging, FLO EV Charging, Ford Motor Company, FreeWire Technologies, Inc., General Motors, Kaluza, Nissan Group of North America, Nuvve Holding Corporation, Sacramento Municipal Utility District, Stellantis N.V., Sunrun, Switch EV Ltd, The Mobility House, Toyota Motor North America, Inc., Veloce Energy, Inc., Wallbox USA Inc., and WeaveGrid. 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/>).



mitigate peak load on distribution circuits in the same way that Generation Units do, helping to provide the grid benefits the DCM is intended to support. This is consistent with DOER's previous Straw Proposal, under which Demand Response, RPS Class I/II, BTM storage, and standalone storage² are all eligible to receive the DCM on circuits with increasing peak demand.³

In fact, EVSE load reduction and exports can even be better candidates for distribution upgrade mitigation than generation resources. Unlike generation resources, which may trigger capacity upgrades on distribution circuits, load reduction and exports through EVSE are often incremental functionalities added on top of equipment and infrastructure that are already deployed to provide EV charging services. VGIC strongly urges DOER to revise the Draft Guideline to make clear that resources that are not Generation Units are also eligible for the DCM. If EVSE is not encouraged by the DCM, Massachusetts will miss out on a significant source of load flexibility – including both load reduction and exports – that can help mitigate distribution system upgrades and support the Commonwealth's clean energy and decarbonization goals.

VGIC Supports the Overall Structure of DOER's DCM Draft Guideline

Aside from the eligibility issue discussed above, VGIC is encouraged by DOER's overall proposed DCM structure. Simplicity in the design and implementation of the DCM will promote administrative efficiency as well as provide more certainty and predictability for VGI efforts, including those by charging station developers, aggregators, and other parties such as fleet owners.

Particularly, VGIC appreciates DOER's proposal to allow resources to reserve capacity on specific DCM-eligible circuits. DOER's Straw Proposal, which was to make the DCM available until the calendar quarter in which the designated eligible MW on the circuit is filled, would have resulted in significant uncertainty for developers. It would be difficult for a

² Standalone storage must accept operating limitations in its ISA and/or accept EDC DERMS signals to limit system operations to be eligible for the DCM.

³ <https://www.mass.gov/doc/cps-dcm-straw-proposal/download>



developer to predict when the designated MW on a given circuit would be filled since the timing would depend on all developers seeking to participate in the Clean Peak Standard program. By ensuring that a developer with reserved capacity on DCM-eligible circuits does not face the risk of the available eligible capacity running out before the project is completed, the updated DCM availability in the Draft Guideline strikes an appropriate balance between providing certainty for developers and avoiding the overdevelopment of resources.

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 Program.

Respectfully submitted,

Ed Burgess

A handwritten signature in black ink, appearing to read "Edward A. Burgess", is placed below the printed name.

Senior Policy Director

Vehicle-Grid Integration Council