



**Comments of the Vehicle-Grid Integration Council (VGIC)**  
**on the Distribution Circuit Multiplier Straw Proposal**

**Introduction**

The Vehicle-Grid Integration Council (VGIC)<sup>1</sup> is a 501(c)(6) nonprofit trade association focused on accelerating the role 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) Straw Proposal.

**VGIC Generally Supports DOER's Distribution Circuit Multiplier Straw Proposal**

EVs and EV supply equipment (EVSE) can participate in Clean Peak Standard as either Demand Response Resources or Qualified Energy Storage Systems, and the DCM will help maximize the vehicle grid integration (VGI) value of EVs/EVSE to the grid in support of Massachusetts's decarbonization goals. Overall, VGIC is encouraged by DOER's proposed DCM structure, including a 2x multiplier for all selected circuits as well as the formulaic methodology for circuit identification. Simplicity in the design and implementation of the DCM will promote administrative efficiency as well as provide more certainty and predictability for

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<sup>1</sup> VGIC member companies and supporters include American Honda Motor Co., Inc., dcbel, Enel X North America, Inc., ENGIE NA, Fermata Energy, FlexCharging, Flo/AddEnergie, Ford Motor Company, General Motors Company, Nissan, Nuvve Holding Corporation, Sacramento Municipal Utility District, Stellantis N.V., Sunrun, The Mobility House, Toyota Motor North America, Inc., Veloce Energy, 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/>).



VGI efforts including those by charging station developers, aggregators, and other parties such as fleet owners.

## **Additional Modifications to the Straw Proposal Could Further Improve EV/EVSE Participation**

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

- *Recommendation 1: The DCM for each identified circuit should be in effect for the full year from circuit identification, until new circuits are identified.* While VGIC appreciates DOER's intention to prevent the potential overdevelopment of resources on identified circuits, the proposed DCM availability (through the calendar quarter in which the designated MW is filled) may not be sufficient to account for the time lag between circuit identification and resource development. It is difficult for a developer to predict when the designated MW on a given circuit will be filled, since the timing will depend on all developers seeking to participate in the Clean Peak Standard program. This uncertainty may lead to situations where a developer anticipating the DCM in the project finance has already begun the resource development process on a specific circuit but is unable to complete the project in time before the DCM is no longer available. Therefore, VGIC is in favor of the alternative process described in DOER's Straw Proposal. Making the DCM available for the full year between the annual circuit identification process will provide developers with certainty that a given project initiated in response to the price signal will be completed in time to receive the DCM.
- *Recommendation 2: EVs/EVSE that participate in Clean Peak Standard as Demand Response Resources should be eligible for the DCM on circuits with high solar PV saturation.* Under DOER's Straw Proposal, Demand Response Resources (DRRs) are only eligible for the DCM on circuits with increasing peak demands, but not on circuits with high solar PV saturation. However, EVs/EVSE, including those participating as



DRRs, are capable of mitigating solar PV saturation if incentivized to do so. Traditional demand response for buildings typically involves load shedding or peak shaving, meaning electricity consumption is simply reduced for a specific period of time (such as during Clean Peak Standard's Seasonal Peak Periods). DOER is correct in determining that this type of demand response does not help address solar PV saturation. However, the service that EVs/EVSE provide as DRRs can be better described as load shifting, where the total electricity consumption stays the same but is moved to another period of time. EVs that reduce or avoid charging during Seasonal Peak Periods, which occur between 3pm and 9pm depending on the season, still need to charge at other times to ensure the transportation needs of the vehicle or fleet owner are met. When these vehicles charge during the midday hours with high solar production, they can help soak up excess solar PV generation, essentially functioning as another form of storage and providing the grid benefits the DCM is intended to support. This is consistent with how behind-the-meter storage and standalone storage would operate to increase the hosting capacity on circuits with high solar PV saturation. DOER should revise the eligibility criteria to reflect this use case and allow EVs/EVSE that participate as DRRs to qualify for the DCM on circuits with high solar PV saturation.

## **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 that reads "Edward A. Burgess". The signature is written in a cursive style with a prominent initial "E".

Policy Director

Vehicle-Grid Integration Council (VGIC)