

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

Order Instituting Rulemaking Regarding Policies,
Procedures and Rules for the Self-Generation
Incentive Program and Related Issues

Rulemaking 20-05-012
(Filed May 28, 2020)

**MOTION FOR PARTY STATUS OF VEHICLE-GRID INTEGRATION
COUNCIL**

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July 27, 2020

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I. Introduction

The Vehicle-Grid Integration Council (“VGIC”)¹ respectfully moves for party status in this proceeding in accordance with Section 1.4 of the California Public Utilities Commission (“Commission”) Rules of Practice and Procedure.

II. Interest in this Proceeding

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 in support of achieving a more reliable, affordable, and efficient electric grid.

VGIC and its member companies are engaged in developing and deploying technologies that could be directly impacted by the Rulemaking (R.) 20-05-012. Specifically, our member companies are focused on VGI applications that include bi-directional systems (charging and discharging) to leverage the utilization of an EV’s embedded mobile energy storage capacity (including batteries or fuel cells) for a number of near-term use cases. VGIC members and supporters have already developed, demonstrated, and publicly reported on vehicles and

¹ VGIC member companies and supporters include American Honda Motor Co., Inc., Connect California LLC, Enel X North America, Inc., Fiat Chrysler Automobiles, Ford Motor Company, General Motors Company, Nissan North America, Inc., Nuvve Corporation, and Toyota Motor North America, Inc. The views expressed in these Comments are those of VGIC, and do not necessarily reflect the views of all of the individual VGIC member companies or supporters. (<https://www.vgicouncil.org/>).

charging equipment with advanced VGI capabilities, and plan to continue development of production-ready vehicles and charging equipment. We believe that these capabilities are strongly aligned with the purpose and goals of the Self-Generation Incentive Program (“SGIP”) program, including GHG emissions reduction, resiliency, and equity. As such, the SGIP technology eligibility policies, procedures, and rules that are being considered in this proceeding are of great interest to the VGIC.

While VGIC firmly believes that a broad set of bi-directional VGI solutions could ultimately be considered eligible under the SGIP framework, at this time we believe that it is appropriate for a very limited subset of high priority bi-directional solutions to be included in the immediate scope of the instant proceeding. Specifically, VGIC would like to focus on the opportunities for bi-directional VGI solutions that provide backup power to customers impacted by Public Safety Power Shutoffs (“PSPS”). These solutions have the potential to complement the suite of other eligible SGIP technologies in providing clean, safe, and affordable backup power that are or could be deployed in the very near term to aid larger resiliency efforts within the SGIP equity-resiliency framework. This would also provide critical demonstrations for VGI technologies that would yield learnings and spillover benefits for other applications.

As such, VGIC is interested in commenting on the preliminary list of issues in scope, including the “consideration of EVs or EV supply equipment (“EVSE”) as eligible technologies, beyond existing SGIP processes.”²

The outcome of decisions made in this proceeding related to these issues may have material impact on the products and services developed by VGIC member companies and supporters. VGIC requests party status in order to contribute to the near-term development of SGIP rules which could allow bi-directional VGI solutions to support resiliency goals.

VGIC recognizes that technical considerations and pilot opportunities for the use of bi-directional VGI backup power solutions and to provide near-term relief to EV customers vulnerable to Public Safety Power Shutoffs (“PSPS”) are actively being discussed in Track 2 of the Microgrids and Resiliency Strategies Proceeding (R.19-09-009). However, VGIC believes that the SGIP program objectives are particularly well-aligned with the benefits VGI backup

² ALJ Email Ruling Noticing July 29, 2020 Pre-Hearing Conference (PHC) and Providing PHC Guidance, July 17, 2020

solutions have to offer.³ VGIC also notes that the VGI resilience solutions being contemplated are a form of bidirectional storage that are distinct from “VIG” smart charging, which we do not recommend to be considered in scope at this time.

VGIC and its members companies and supporters are interested in developing market pathways for these high-value backup power solutions, and we want to ensure that industry perspectives are sufficiently represented. VGIC intends to provide a formal oral statement during the upcoming Prehearing Conference scheduled for July 29, 2020. In addition, VGIC plans to actively participate in subsequent actions within this proceeding.

III. Notice

Service of notices, orders, and other correspondence in this proceeding should be directed to VGIC at the address set forth below:

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IV. Conclusion

VGIC’s participation in this proceeding will not prejudice any party and will not delay the schedule or broaden the scope of the issues in the proceeding. For the reasons stated above, VGIC respectfully requests that the CPUC grant this Motion for Party Status filing.

Dated: July 27, 2020

Respectfully submitted,

³ California Public Utilities Commission, “Staff Proposal for Facilitating the Commercialization of Microgrids Pursuant to Senate Bill 1339” 23-27, Proposal 5: Direct Utilities to Conduct Pilot Studies of Low-cost, Reliable Electrical Isolation Methods. <https://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M344/K038/344038386.PDF>

A handwritten signature in black ink, appearing to read "Edward Burgess". The signature is fluid and cursive, with the first name "Edward" and last name "Burgess" clearly distinguishable.

Edward Burgess

Policy Director

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