

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

Order Instituting Rulemaking to
Continue the Development of Rates
and Infrastructure for Vehicle
Electrification.

Rulemaking 18-12-006
(Filed December 13, 2018)

**REPLY COMMENTS OF THE VEHICLE-GRID INTEGRATION
COUNCIL ON THE PROPOSED DECISION SETTING NEAR-TERM
PRIORITIES FOR TRANSPORTATION ELECTRIFICATION
INVESTMENTS BY THE ELECTRICAL CORPORATIONS**

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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”) ¹ hereby submits these reply comments on the *Proposed Decision Setting Near-Term Priorities for Transportation Electrification Investments by the Electrical Corporations*, issued on June 1, 2021.

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

¹ 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/>).

discharging is recognized and compensated in support of achieving a more reliable, affordable, and efficient electric grid.

II. ANY CAP IMPOSED ON UTILITY OWNERSHIP OF EVSE SHOULD BE MADE FLEXIBLE IF THE EVSE INCORPORATES VGI SOLUTIONS.

In opening comments, several parties weigh in on the proposed restriction to IOU ownership of behind-the-meter make-ready and EVSE. For example, PG&E stated “the PD arbitrarily restricts IOU ownership of BTM make-ready and EVSE to no more than 50 percent of the customer side infrastructure per program proposal. Additionally, the PD restricts any IOU ownership of EVSE except for sites located in underserved communities.”² Given the relative nascency of TE infrastructure deployment, VGIC remains agnostic regarding whether a specific cap should be imposed on utility ownership of behind-the-meter make-ready and EVSE. However, to the extent a specific cap is imposed, VGIC recommends the Commission allow for flexibility tied to the VGI capabilities of the EVSE. For example, IOUs could be permitted to own a certain share of EVSE if the equipment is placed on an existing service line. This would ensure the goals of SB 676 can still be met without overburdening ratepayers or disrupting progress toward accelerated TE.

In recognition of the uncertainties that TE program design brings, VGIC offers that the Commission consider hiring an auditor to assess TE program metrics and ratepayer impact. A robust program audit could be valuable in supporting future policy decisions regarding IOU ownership of EVSE.

² PG&E Comments at 1.

III. REFERENCE TO VGI WORKING GROUP’S LOAD MANAGEMENT GUIDANCE SHOULD BE REPLACED WITH DEFAULT ENROLLMENT IN DR PROGRAM.

As noted in VGIC’s opening comments, the PD references “VGI Working Group’s Load Management Guidance” but does not provide more detail or refer to a specific document.³ In recognition of this gap, VGIC recommends the Commission require any requests for extensions to existing programs or pilots align with the recent decision requiring SCE Charge Ready 2 customers to enroll in a demand response program by default. Specifically, the PD should be revised to state:

“Any application for an extensions to a pilot **or program** should demonstrate that... 2) the extension makes modifications to align with the **recent decision requiring SCE Charge Ready 2 customers to enroll in a demand response program by default**~~Vehicle-Grid Integration (VGI) Working Group’s load management guidance,~~”⁴

IV. VGIC WOULD LIKE TO CLARIFY ITS OPENING COMMENTS REGARDING SEPARATION OF ELECTRIC VEHICLES FROM OTHER LOADS AND RESOURCES.

In opening comments, VGIC recommended the Commission consider TE programs, pilots, and rates that do not separate EVs from other behind-the-meter loads and resources. VGIC would like to clarify that there are a set of issues that can generally be broken down into two categories:

1. Separating EVs from site load limits the opportunity for EVs to support VGI applications, including demand response, customer bill management, and backup power.
2. Separating EVs from other BTM DERs limits the opportunity for EVs to support customer self-supply of renewables.

³ VGIC Comments at 6.

⁴ PD at 26.

In opening comments, ChargePoint recommended the Proposed Decision “apply the Commission’s resolution of EVSE submetering to all utility TE programs going forward.”⁵ VGIC believes the Commission could address the separation of EVs from site load by disposing of pending issues in the development of an EV Submetering Protocol, per ChargePoint’s recommendation. Future TE programs, pilots, and rates should be designed to incorporate submetering approaches as an alternative to separately-metered EVSE. Regarding the separation of EVs from other BTM DERs, VGIC acknowledges that there are several complex issues that should be worked out, including but not limited to interactions of the following with TE programs: Net Metering policies, other applicable DER rate design, and the Self Generation Incentive Program.

V. CONCLUSION.

VGIC appreciates the opportunity to submit these reply comments on Near-Term Priorities for TE. We look forward to further collaboration with the Commission and stakeholders on this initiative.

Respectfully submitted,



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⁵ ChargePoint Comments at 13.

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