

**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 ON TRANSPORTATION  
ELECTRIFICATION POLICY AND INVESTMENT**

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November 8, 2022

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In accordance with the California Public Utilities Commission Rules of Practice and Procedure, the Vehicle-Grid Integration Council (“VGIC”) hereby submits reply comments on the *Proposed Decision on Transportation Electrification Policy and Investment*, issued on October 14, 2022.

**I. REPLY TO COMMENTS ON VGI STRATEGY AND FORUM.**

A diverse set of stakeholders, including AAI, ATE, Center for Community Action and Environmental Justice, East Yard Communities for Environmental Justice, Sierra Club, and UCS (collectively, “Joint Commenters”), EDF, and WeaveGrid support the inclusion of a VGI strategy but generally agree that the Commission must be more specific in setting a VGI strategy and effective goals.<sup>1</sup> Notably, ATE opposes the PD yet supports moving forward with a VGI strategy and forum. Similarly, while VGIC does not necessarily support PG&E’s overarching recommendation to reject the PD, we do agree with their assessment that “the PD does not provide a clear strategy for how the Commission will endeavor to ensure ratepayer-funded incentives are

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<sup>1</sup> See, Opening Comments of AAI on PD at 5. Opening Comments of ATE on PD at 2 and 5. Opening Comments of Joint Commenters at 7. Opening Comments of EDF on PD at 9. Opening Comments of WeaveGrid on PD at 4.

supporting reducing grid costs, fully utilizing renewable energy, and enhancing reliability.”<sup>2</sup> In considering specific revisions to the PD, VGIC strongly supports EDF’s recommendation for the Commission to establish specific *VGI Goals*. This aligns with VGIC’s comments on the Draft TEF as well as our opening comments on this PD, where we offer not only authoritative literature supporting a **Goals-Outcomes-Metrics** policy framework, but also offer an example of its implementation in a state facing grid challenges not entirely dissimilar to California’s (i.e., Hawaii) and example *VGI Goals, Outcomes, and Metrics* for California.<sup>3</sup>

## **II. REPLY TO COMMENTS ON EV SUPPLY EQUIPMENT.**

**A. Bidirectional charging.** As noted in our Opening Comments, VGIC strongly recommends the Commission direct bidirectional charger capability to be considered in guidance on FC1 rebates, such that bidirectional chargers are not only eligible for rebates, but also receive an appropriate level of rebate commensurate with their grid and customer benefits. Meanwhile, in Opening Comments, the Joint Commenters recommend that bidirectional charging be explicitly considered as a strategic focus area for the VGI Strategy and VGI Forum.<sup>4</sup> In addition to VGIC’s proposed revision to the PD’s guidance for FC1 rebate development, VGIC also strongly supports the Joint Commentor’s proposed revision to the PD, including the redline revisions proposed by Joint Commenters to PD pages 162-163 and 165 and Ordering Paragraph 11. Both PD revisions are critical to ensuring VGI is maximized, as the VGI Forum will be established before FC1 commences, so VGIC’s proposed revisions to the program guidelines would only impact post-2025 deployments. It is critical that bidirectional charging support be provided before FC1

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<sup>2</sup> Opening Comments of PG&E on PD at 8-9.

<sup>3</sup> See Opening Comments of EDF on PD at 10. Opening Comments of VGIC at 4. Comments of VGIC on Draft TEF Sections 3.4 and 11.3 at 3-10.

<sup>4</sup> Opening Comments of Joint Commentors at 7.

commences in 2025, as the grid and customer benefits of doing so are clear and well-established throughout this proceeding and a clear policy imperative under SB 676.

**B. Data sharing requirement.** In opening comments, VGIC, Chargepoint, Electrify America, and EVgo note that the PD does not provide ample justification for the data sharing requirements.<sup>5</sup> Specifically, VGIC supports EVgo’s recommendation that additional stakeholder process be held to determine what data reporting requirements are necessary. We reiterate that imposing unsubstantiated and ambiguous data sharing requirements is unreasonable at this time.

### **III. REPLY TO COMMENTS ON AUTOMATED LOAD MANAGEMENT.**

**A. Definition of ALM.** Opening comments from EDF, EDF Renewables, EV Association, Freewire, Siemens, The Mobility House (“TMH”), and WeaveGrid reflect an overwhelming consensus that ALM solutions can save time and money for customers.<sup>6</sup> Notably, EDF asserts that “the Commission should require the utilities to use sophisticated VGI to mitigate the buildout need to the maximum extent possible, and establish incentives that reward successful mitigation and penalize avoidable overbuilding.”<sup>7</sup> Moreover, VGIC agrees with TMH that “the Commission should make room in its definition of the technology to encompass a variety of use cases and configurations to avoid limiting the applications and opportunities innovative companies can offer customers,”<sup>8</sup> and specifically supports the expansion of the definition to include customer-side upgrade deferral. VGIC retains its opening comment’s recommendation for a robust stakeholder

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<sup>5</sup> See Opening Comments of ChargePoint at 10. Opening Comments of Electrify America at 2. Opening Comments of EVgo at 6.

<sup>6</sup> See, Opening Comments of EDF on PD at 9. Opening Comments of EDF Renewables on PD at 4. Opening Comments of EVA at 5. Opening Comments of FreeWire at 2. Opening Comments of Siemens at 1. Opening Comments of TMH at 3. Opening Comments of WeaveGrid at 6.

<sup>7</sup> Opening Comments of EDF on PD at 9.

<sup>8</sup> Opening Comments of TMH at 3.

process to revise the definition, as has been done in the past with this nuanced topic. However, as an alternative, VGIC would support the adoption of EDF Renewables' proposed revisions to the ALM definition, which would insert "*customer and/or*" before "*utility side of the meter.*"

**B. ALM Study and Rebate.** In Opening Comments, EDF Renewables recommends more granular ICA maps as a tool to promote ALM that is specifically intended to defer or avoid utility-side upgrades. VGIC supports this in theory, but questions whether accurate, granular, and easily accessible ICA data may be available in the near term, as indicated by ongoing efforts in the IDER and High DER proceedings. Ideally, ICA maps will provide data needed to determine the level of distribution system savings attributed to each site, and then use that data to determine the appropriate cost share for ratepayers (via distribution cost savings), site hosts (via ALM incentive), and the utility (via TMH's proposed earnings adjustment mechanism or similar approach). However, while accurate, granular, and accessible ICA maps are being developed, VGIC recommends an interim ALM incentive approach derived from average system-wide costs of utility-side TE distribution upgrades found in the EV Load and Research Report. While at an individual level, this may result in ALM incentives where ALM election did not directly defer or avoid utility-side infrastructure, on a programmatic scale this will ultimately lead to more distribution deferral and avoidance. Notably, this reasoning underscores the ongoing Partnership Pilot to promote DER non-wires alternatives for larger, primary grid upgrades. On a programmatic scale, this approach was deemed to help avoid or defer distribution upgrades such that the benefits outweighs the costs. The key question in that proceeding, as will be the case in designing an ALM incentive, is how *exactly* to design the ALM incentive such that the benefits do, in fact, outweigh the costs. With this in mind, VGIC supports Siemens' assertion that an ALM study should

recommend how rebates will be calculated and agrees with TMH that the ALM study, as proposed, “lacks urgency.”

**C. Energization timelines.** VGIC agrees with EVgo and Tesla that energization timelines should be addressed. These parties recommend a separate forum be hosted to develop solutions to streamline energization. VGIC does not oppose a separate forum but offers that this issue could be scoped into the VGI forum, and, in turn, the forum could be expanded (e.g., from a two-day forum to a three-day forum) to account for the added scope. VGIC believes it may be reasonable to link the two discussions as some solutions to the energization timeline challenge can be found in VGI strategies (i.e., ALM).

**IV. REPLY TO COMMENTS ON WORKPLACE CHARGING.**

VGIC strongly supports recommendations from GPI, EDF Renewables, and ChargePoint to include funding for workplace charging in FC1. We are specifically compelled by ChargePoint’s statement that “access to workplace charging has been found to increase the likelihood of an employee choosing to drive electric sixfold.”<sup>9</sup>

**V. CONCLUSION.**

Respectfully submitted,



Edward Burgess

November 8, 2022

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<sup>9</sup> Opening Comments of ChargePoint on PD at 7.