

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

Application of Pacific Gas and Electric Company
(U 39 M) for Approval of its Proposal for a Day-
Ahead Real Time Rate and Pilot to Evaluate
Customer Understanding and Supporting
Technology

Application No. 20-10-011
(Filed October 23, 2020)

**RESPONSE OF THE VEHICLE-GRID INTEGRATION COUNCIL TO
THE MOTION OF PACIFIC GAS AND ELECTRIC COMPANY TO
CONSOLIDATE REAL-TIME PRICING ISSUES INTO A SINGLE
PROCEEDING**

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January 4, 2021

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In accordance with Rules of Practice and Procedure of the California Public Utilities Commission (“Commission”), the Vehicle-Grid Integration Council (“VGIC”) hereby responds on behalf of its members to the *Motion of Pacific Gas and Electric Company (“PG&E”) to Consolidate Real-Time Pricing Issues Into a Single Proceeding*. Pursuant to Rule 11.1 of the Rules of Practice and Procedure, VGIC timely files this response on January 4, 2021.

I. INTRODUCTION.

VGIC is a 501(c)6 membership-based advocacy group committed to advancing the role of electric vehicles (“EVs”) and vehicle-grid integration (“VGI”) through policy development, education, outreach, and research. VGIC supports the transition to decarbonized transportation and electric sectors 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.

II. VGIC SUPPORTS PG&E’S MOTION TO CONSOLIDATE THE REAL TIME PRICING ISSUES IN THE DAY-AHEAD HOURLY REAL-TIME PRICING (“DAHRTP-CEV”) APPLICATION WITH TESTIMONY SERVED IN PG&E’S 2020 GENERAL RATE CASE PHASE II (“GRC II”).

As noted in our response to the DAHRTP-CEV Application, VGIC strongly supports dynamic pricing options for EV or VGI customers, and believes that dynamic pricing options – if designed appropriately – can complement other existing and forthcoming VGI strategies to advance transportation electrification, deliver increased value to ratepayers (both EV and non-EV owners), enhance grid reliability, and foster a growing market for VGI services.¹ VGIC supports PG&E’s motion, which – if granted – would provide enhanced opportunities to examine not only the potential benefits of offering a real-time pricing rate option, but also the benefits of expanding these options to a broader population of VGI customers than the limited subset of commercial customers in PG&E’s original application. We believe the proposal PG&E has laid out in its motion will help to accomplish a better outcome, without unduly delaying or burdening the resolution of other remaining issues in the general rate case. Additionally, VGIC believes that combining the scope of the application with PG&E’s general rate case would allow for greater flexibility in defining and enabling other critical objectives, including: 1) mechanisms to reward or credit VGI customers on real-time pricing rate options for energy exported to the grid (including non-NEM customers), 2) any potential improvements to the non-commodity portion of the proposed rate design, and 3) the use of inherent EV and/or EVSE capabilities to minimize implementation costs. VGIC agrees that, by granting the motion, the Commission can facilitate a more holistic consideration of real-time pricing issues to better ensure consistency and efficiency, as well as to meaningfully expand dynamic real-time rate options for VGI customers.

¹ *Response of the Vehicle-Grid Integration Council to the Application of Pacific Gas and Electric Company (U 39 M) for Approval of its Proposal for a Day-Ahead Real Time Rate and Pilot* at 3.

III. CONCLUSION.

VGIC appreciates the opportunity to submit this response to PG&E's Motion to Consolidate. We look forward to further collaboration with the Commission and stakeholders on this initiative.

Respectfully submitted,

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