



February 28, 2023

Hon. Michelle L. Phillips
Secretary to the Commission
New York State Public Service Commission
Empire State Plaza
Agency Building 3
Albany, NY 12223-1350

RE: Case 18-E-0138: Proceeding on Motion of the Commission Regarding Electric Vehicle Supply Equipment and Infrastructure

Matter 22-02356: In the Matter of EV Technical Standards Working Group

**Comments of the Vehicle-Grid Integration Council (VGIC)
to the Joint Utilities' Testing Proposal for Managed Charging-Enabling Technologies**

The Vehicle-Grid Integration Council (VGIC)¹ is a 501(c)(6) membership-based trade association 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. VGIC appreciates the opportunity to provide these comments on the Joint Utilities' proposal for testing the accuracy of managed charging-enabling technologies.

Overall, the Joint Utilities' proposal will help advance the use of managed charging-enabling technologies for submetering purposes, and VGIC commends the Joint Utilities' effort and thought in developing the proposal. The collection of charging data from several sources (utility meter, EV supply equipment, onboard diagnostics, telematics aggregator) for the same charging session will enable a comparison of the capabilities of each pathway to inform the Technical Standards Working Group (TSWG) and the Commission in determining the

¹ VGIC member companies and supporters include American Honda Motor Co., Inc., BorgWarner, Inc., bp pulse, Customized Energy Solutions, dcbe1, Enel X North America, Inc., ENGIE NA, Fermata Energy, FlexCharging, FLO EV Charging, Ford Motor Company, FreeWire Technologies, Inc., General Motors, Gridwiz, Inc., Hoosier Energy, Innovation Core SEI, IoTecha, Kaluza, Kitu Systems, NineDot Energy, Nissan Group of North America, Nuvve Holding Corporation, Peak Power, Q CELLS USA Corp., Sacramento Municipal Utility District, Stellantis N.V., Sunrun, Switch EV Ltd, The Mobility House, Toyota Motor North America, Inc., Utilidata, Inc., Veloce Energy, Inc., Wallbox USA 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/>)



appropriate data accuracy standards. This exercise will be useful not only for New York's transportation electrification goals but also for other states looking to follow New York's footsteps in exploring and implementing submetering.

Additionally, VGIC appreciates the Joint Utilities' willingness to explore incorporating Direct Current Fast Chargers (DCFCs) into the testing process, per the discussion during the February 15th TSWG meeting, even though it is not a requirement under the July 2022 Managed Charging Order. As stakeholders have pointed out, commercial customers with DCFCs also stand to benefit from submetering, especially those seeking to leverage their EVs for bidirectional use cases such as demand charge management or resiliency (*i.e.*, vehicle-to-building or vehicle-to-microgrid). By lowering electric bills and enhancing the value proposition of EVs, these use cases will help promote transportation electrification, including the electrification of medium- and heavy-duty vehicles.

Lastly, given the significant potential benefits of submetering, VGIC encourages the Joint Utilities and TSWG to conduct the testing process and develop proposals for accuracy standards and testing protocols on an accelerated timeline compared to that established in the July 2022 Managed Charging Order. The July 2024 deadline for completing the testing process and October 2024 deadline for submitting a comprehensive filing to the Commission, as laid out in the Managed Charging Order, represent the latest possible dates for the completion of these actions.² However, the TSWG is free to target earlier completion dates. Based on the maximum timelines (*i.e.*, July 2024 for testing and October 2024 for proposal filing), submetering will likely not be enabled for EV customers in New York until 2025-2026 timeframe, much later than the likely availability of the EV Phase-In Rate in the 2024-2025 timeframe.³ This means that customers with lower charging capacity than other site loads who would otherwise take advantage of the submetering capabilities of their EVSE or EVs will either have to 1) install a separate meter and bear the associated costs, or 2) forego the potential bill savings under the EV Phase-In Rate altogether.⁴ Therefore, VGIC encourages the Joint Utilities and TSWG to accelerate their efforts in order to maximize the number of customers who can leverage submetering to participate in the EV Phase-In Rate.

² Order Approving Managed Charging Programs with Modifications, pg. 27-28. July 14, 2022. Case 18-E-0138. <https://documents.dps.ny.gov/public/Common/ViewDoc.aspx?DocRefId={A1E3F84E-0710-4073-865F-FE7D4816B76B}>

³ Order Establishing Framework for Alternatives to Traditional Demand-Based Rate Structures, pg. 10. January 19, 2023. Case 22-E-0236. <https://documents.dps.ny.gov/public/Common/ViewDoc.aspx?DocRefId={2043A628-EC7D-4064-9F32-662D82598760}>

⁴ See Order Establishing Framework for Alternatives to Traditional Demand-Based Rate Structures, Appendix C. January 19, 2023. Case 22-E-0236. <https://documents.dps.ny.gov/public/Common/ViewDoc.aspx?DocRefId={2043A628-EC7D-4064-9F32-662D82598760}>



VGIC appreciates the opportunity to provide these comments and looks forward to continuing working with the Commission, Staff, the Joint Utilities, and other stakeholders to ensure the success of New York's transportation electrification efforts.

Respectfully submitted,

Ed Burgess

A handwritten signature in black ink that reads "Edward A. Burgess". The signature is fluid and cursive, with the first letters of the first and last names being capitalized and prominent.

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