



May 30, 2023

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

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

**Reply Comments the Vehicle-Grid Integration Council (VGIC)
on the Make-Ready Program Mid-Point Review Staff Whitepaper**

Introduction

The Vehicle-Grid Integration Council (VGIC)¹ is a 501(c)(6) member-based 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 to achieve a more reliable, affordable, and efficient electric grid. VGIC appreciates the opportunity to provide these reply comments on Staff’s Make-Ready Program Midpoint Review and Recommendations Whitepaper.

¹ VGIC member companies and supporters include American Honda Motor Co., Inc., BorgWarner, bp pulse, Customized Energy Solutions, dcbel, Enel X North America, Inc., Enphase Energy, Fermata Energy, FlexCharging, FLO EV Charging, Ford Motor Company, FreeWire Technologies, Inc., General Motors, GridWiz, Hoosier Energy, Innovation Core SEI, IoTecha, Kaluza, Kitu Systems, Ninedot Energy, Nissan Group of North America, Nuvve Holding Corporation, Peak Power, Qcells, Sacramento Municipal Utility District, Stellantis N.V., Sunrun, The Mobility House, Toyota Motor North America, Inc., Utilidata, 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/>)

Incentives for Cost-Reducing Advanced Technologies

Along with VGIC, several parties expressed support for Staff’s proposal to extend make-ready incentives to cost-reducing advanced technologies such as battery storage.² In addition, a simple, streamlined process to determine the incentive eligibility and amount that site hosts can expect to receive will be critical for the deployment of advanced technologies that can help reduce the grid and ratepayer costs associated with make-ready infrastructure. Several parties recommended that the Commission avoid requiring site-specific cost-benefit analysis to determine eligibility for such incentives. Rather, a standardized method, such as a set dollar per kW reduced, could help provide simplicity and predictability, enabling site hosts and technology providers to determine the most cost-effective technology for their needs and accurately assess the financial viability of projects.

Earthjustice and Sierra Club recommended that site hosts be required to quantify the cost and potential cost savings of the advanced technology and to size incentives for each site only to overcome the upfront cost barrier but not provide windfalls to the site host.³ While VGIC supports Earthjustice and Sierra Club’s intent to ensure that the deployment of advanced technologies provides grid and ratepayer benefits and avoids providing excessive subsidies to site hosts, VGIC believes this proposal would place a significant burden on site hosts, delay installation timelines, and discourage the deployment of these advanced technologies. Instead, the net benefits to the grid and ratepayers should be demonstrated at the portfolio level rather than at individual sites. As long as the total amount of incentives paid out to all site hosts for advanced technologies results in cost savings on aggregate, then the incentives will have yielded benefits to the grid and ratepayers. As the use and understanding of these advanced technologies mature such that customers can more easily quantify benefits and costs, VGIC believes

² See comments from PowerFlex (pg. 3), NY-BEST (pg. 2-3), Advanced Energy United & ACE NY (pg. 11), Joint Utilities (pg. 24), the City of New York (pg. 21), FreeWire (pg. 3), EnergyHub (pg. 4), and SWTCH (pg. 4-5).

³ See Earthjustice & Sierra Club comments (pg. 4-5).

Earthjustice and Sierra Club’s recommendation should be revisited to ensure the long-term sustainability of this offering.

The Commission should also adopt a broad and comprehensive definition of “advanced technologies.” The Staff Whitepaper points to “battery paired solutions” as an approach that can “reduce peak demand of chargers and lower make-ready cost.” However, as mentioned in VGIC’s initial comments, Automated Load Management (“ALM”) solutions, which refer to the same technologies Staff calls “cost-reducing advanced technologies,” include a range of software- and hardware-based approaches. In addition to co-located or integrated storage, these include power sharing, rectifier cabinets, and other solutions, all of which can reduce the peak demand of chargers at a given site and, in turn, lower make-ready costs. Any solution that can achieve the same objectives should be eligible for make-ready incentives. Several parties commented on the need for incentives to be technology-agnostic to include all possible approaches to demand management.⁴

Similarly, Staff’s discussion of power sharing and questions regarding potential asymmetrical incentives for customer-side and utility-side make-ready should also apply to the wide range of ALM technologies and approaches. VGIC supports funding a higher capacity on the customer-side to encourage ALM adoption but agrees with other parties that there should not be a minimum utility-to-customer-side ratio.⁵ Flexibility is important to accommodate the unique charging and load management needs of each charging site.

Stakeholder Processes to Address Barriers to VGI

There is strong support among stakeholders for Staff’s proposal to address interconnection and other barriers to VGI through additional stakeholder processes.⁶ However, parties also agree with VGIC that the Technical Standards Working Group (TSWG) may not be

⁴ See comments from PowerFlex (pg. 3), Advanced Energy United & ACE NY (pg. 11), SWTCH (pg. 4-5).

⁵ See comments from PowerFlex (pg. 4), Advanced Energy United & ACY NY (pg. 13-14)

⁶ See comments from the City of New York (pg. 12-13), NY-BEST (pg. 3-4), Alliance for Transportation Electrification (pg. 10), Joint Utilities (pg. 25), and Nuvve (pg. 2-3).

the most appropriate venue for this effort. Similar to what VGIC proposed in initial comments, Nuvve and NY-BEST also recommended that most VGI-related issues be addressed by the VGI Working Group (VGI WG).⁷ However, Nuvve and NY-BEST also recommended that the topic of interconnection specifically be addressed in the Interconnection Technical Working Group (ITWG), which already addresses both load and exports for stationary battery storage.⁸

Additionally, Fermata Energy highlighted that stakeholders are already engaging the ITWG regarding technical standards for V2X interconnection.⁹ VGIC agrees with Nuvve and NY-BEST that the interconnection process for unidirectional and bidirectional EVSE should be addressed in a coordinated manner rather than being bifurcated into different working group processes, which could potentially result in disjointed and conflicting rules. Given its ongoing work on similar issues, the ITWG should be the venue for further work on EVSE interconnection. The VGI WG should address other VGI-related issues such as customer education, demand response participation, resiliency use cases, and other incentives, pilots, or programs. The TSWG should continue to focus on its current effort on EV and EVSE metering accuracy testing.

Support for Bidirectional Charging

Along with VGIC, several parties voiced support for Staff’s proposal to update all the Joint Utilities’ VDER tariffs to extend eligibility for compensation to vehicle-to-grid (“V2G”) exports.¹⁰ As discussed in VGIC’s initial comments, additional steps are necessary to help spur the bidirectional charging market in New York. For example, opening comments demonstrated strong support among V2G stakeholders for a temporary waiver of UL 1741-SB requirements for V2G DC EVSE.¹¹ VGIC also supports Nuvve’s recommendation that the Joint Utilities develop a V2G VDER calculator to help fleet customers considering investments in bidirectional charging estimate potential revenues from VDER, similar to the existing VDER calculators for

⁷ See comments from NY-BEST (pg. 4) and Nuvve (pg. 1-2).

⁸ See comments from NY-BEST (pg. 5) and Nuvve (pg. 2-3).

⁹ See Fermata Energy comments (pg. 2)

¹⁰ See comments from NY-BEST (pg. 4), Advanced Energy United & ACE NY (pg. 12), EnergyHub (pg. 5), Nuvve (pg. 2), and Fermata Energy (pg. 1-2).

¹¹ See comments from NY-BEST (pg. 4), Nuvve (pg. 3), and Fermata Energy (pg. 2-3).



solar and stationary battery storage.¹² The V2G VDER calculator can then be included as part of the Joint Utilities’ Fleet Assessment Services, as recommended by Fermata Energy.¹³

Additionally, VGIC agrees with the City of New York that bidirectional charging should be considered an “advanced technology” and, therefore, eligible for make-ready incentives.¹⁴

Conclusion

VGIC appreciates the opportunity to provide these comments and looks forward to working with the Commission, 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 written in a cursive style with a prominent initial "E".

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¹² See Nuvve comments (pg. 2).

¹³ See Fermata Energy comments (pg. 3).

¹⁴ See the City of New York comments (pg. 20-21).