



May 3, 2023

CPUC Energy Division Tariff Unit
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Re: Comments of the Vehicle Grid Integration Council to Resolution E-5267: Approval, with Modifications, of Southern California Edison Company's, Pacific Gas and Electric Company's, and San Diego Gas & Electric Company's proposed modifications to the Emergency Load Reduction Program.

Dear Sir or Madam:

Pursuant to General Order 96-B and the Comment Letter accompanying Draft Resolution E-5267 ("Draft Resolution"), the Vehicle Grid Integration Council ("VGIC") respectfully comments on the proposed approval of the Joint Advice Letter 4142-E of San Diego Gas and Electric Company ("SDG&E"), Advice Letter 4950-E of Southern California Edison Company ("SCE"), and Advice Letter 6826-E of Pacific Gas and Electric Company ("PG&E") submitted on January 17, 2023 and Supplemental Advice Letters SCE 4950-E-A, PG&E 6826-E-A, and SDG&E 4142-E-A filed on March 24, 2023.

The Draft Resolution adopts several important updates to the Emergency Load Reduction Program ("ELRP") and, most importantly, retains the critical elements of the Electric Vehicle ("EV")/Vehicle-Grid Integration ("VGI") Aggregation customer group (i.e., subgroup A.5) that serves as the foundation for the future of bidirectional vehicle-to-grid ("V2G") activities in California. In particular, VGIC strongly supports the Commission's confirmation that the 30-hour dispatch condition specific to customer group A.5 is an appropriate and necessary component of ELRP, given the relatively nascent V2G market.¹ In modifying the Joint ALs to uphold California's commitment to advancing VGI, the Draft Resolution is a symbol of continued progress toward widespread VGI operations and represents an encouraging reflection of close collaboration between subject matter experts at the Commission, investor-owned utilities, and industry stakeholders. VGIC is pleased to see that the ELRP modifications for 2023 (including the critical components that have been reaffirmed) are consistent with the needs of customers and broader VGI market development.

¹ Draft Resolution at 15.

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Specifically, VGIC is encouraged by the Commission’s reiteration that minimum dispatch conditions “provide more certainty to aggregators regarding potential compensation”² and that “the market for VGI technologies, and in particular bi-directional charging equipment, is in its early stages of development and... the ELRP pilot [is] an opportunity to deploy and scale this resource.”³ The Draft Resolution will further unlock EVs as a critical resource supporting grid reliability and broad multi-sectoral decarbonization.

While VGIC is largely supportive of the Draft Resolution, we do have a minor concern regarding the Calculation of Group A ILR using Method 2. As CalSSA points out, this could lead to under-compensation for the unique category of resources within sub-group A.4. This may also be true for A.5 participants. For example, a bi-directional EV might be able to provide exports during the most acute net load peak hours (i.e., 6-8 pm) but then may need to stop exporting during the final hour of the ELRP window (i.e., 8-9 pm) to preserve EV battery range for mobility purposes. In such a case, Method 2 could unfairly penalize A.5 participants. Thus, if the Commission adopts Method 2, there should be an option for A.5 participants to shorten the duration of the dispatch window (e.g., to 6-8 pm).

With this in mind, VGIC strongly recommends that the Commission adopt the Draft Resolution during its May 18th voting meeting.

VGIC appreciates the opportunity to submit these comments to the Draft Resolution and looks forward to future collaboration with the Commission and IOUs on this initiative.

Respectfully submitted,

/s/ Zach Woogen

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Service lists R.20-11-003, A.22-05-002

² *Ibid.*

³ *Ibid.*