

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

Order Instituting Rulemaking to
Establish Policies, Processes, and
Rules to Ensure Reliable Electric
Service in California in the Event of an
Extreme Weather Event in 2021.

Rulemaking 20-11-003
(Filed November 19, 2020)

REPLY BRIEF OF THE VEHICLE GRID INTEGRATION COUNCIL

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September 27, 2021

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In accordance with the Rules of Practice and Procedure of the California Public Utilities Commission (“Commission”), the Vehicle Grid Integration Council (“VGIC”) hereby submits this reply brief pursuant to the *Assigned Commissioner’s Scoping Memo and Ruling* (“Scoping Memo”), issued by Assigned Commissioner and President Marybel Batjer on August 10, 2021. VGIC also timely served opening and reply testimony on September 1 and 10, respectively, in the request for party proposals.

I. SCE’S CONTRIBUTIONS TO THE RECORD REGARDING THE EV/VGI AGGREGATION PILOT ARE BASED ON A MISINTERPRETATION OF THE PROPOSED PILOT AND SHOULD BE DISMISSED.

In Opening Testimony, several parties including VGIC, ev.energy, PG&E, Joint DR Parties, and California Energy Storage Alliance expressed support for the staff concept EV/VGI Aggregation Pilot.¹ As detailed in the staff concept paper, the EV/VGI Aggregation Pilot would establish a pathway within the Emergency Load Reduction Program (“ELRP”) for EV/VGI

¹ Pacific Gas and Electric Company Emergency Reliability Order Instituting Rulemaking Errata Testimony at 7-4; Prepared Direct Testimony of the California Solar & Storage Association at 3; Opening Testimony of Ed Burgess on Behalf of the Vehicle Grid Integration Council at 3; Opening Phase II Prepared Testimony of Joseph Vellone on Behalf of EV.Energy Corp at 7; Phase 2 Opening Prepared Testimony of Joint DR Parties at 4.

aggregators to support the grid. The staff concept clearly states that an EV/VGI aggregation is a “network of V1G or bi-directionally capable charging stations”² (emphasis added). The above-listed parties that indicated support for the pilot also recommended detailed modifications to maximize load reduction from the EV/VGI Aggregation Pilot, some of which VGIC support.³ Each party clearly understood the proposed pilot concept and the definition of a VGI/EV aggregation, and VGIC urges the Commission to consider the pilot design modifications included in VGIC’s testimony and reply testimony.⁴

Meanwhile, SCE’s contributions to the record with respect to the EV/VGI Aggregation Pilot have focused solely on the concept of V2G configurations.⁵ While VGIC supports the inclusion of bidirectional resources in the pilot, it seems clear to all parties – other than SCE – that the pilot’s intent is to unlock EV/VGI *aggregations*. In reply testimony, VGIC flagged this inconsistency, stating “SCE’s testimony may be based on a misinterpretation of the staff concept, and consideration of SCE’s opposition may distract from the critical opportunity to leverage EVs for reliability through this pilot.”⁶

In opening briefs, SCE reiterated its concerns about V2G program design, but again failed to address the EV/VGI Aggregation Pilot concept as it was proposed in the staff concept paper.⁷ VGIC appreciates SCE’s willingness to engage on issues related to V2G generally, and we look

² Brian Stevens. Email Ruling Issuing Commission Developed Staff Concepts Proposal Document and Seeking Comment in Opening Testimony Due September 1, 2021. Rulemaking 20-11-003. August 16, 2021. Page 10.

³ Reply Testimony of Ed Burgess on Behalf of the Vehicle Grid Integration Council at 7.

⁴ See Opening Testimony of Ed Burgess on Behalf of the Vehicle Grid Integration Council at 3 and Reply Testimony of Ed Burgess on Behalf of the Vehicle Grid Integration Council at 7.

⁵ Direct Testimony of Southern California Edison Company – Phase 2 at 68; Southern California Edison Company’s Opening Brief at 41.

⁶ Reply Testimony of Ed Burgess on Behalf of the Vehicle Grid Integration Council at 2.

⁷ Southern California Edison Company’s Opening Brief at 41.

forward to collaborating with SCE to address these concerns through the appropriate proceedings and policy forums. However, SCE’s contributions to the record on the EV/VGI Aggregation Pilot are unnecessarily complicating what is otherwise a no-regrets strategy to unlock additional load reduction for summer 2022 and 2023. VGIC strongly recommends the Commission dismiss SCE’s obfuscating opening testimony, reply testimony, and opening brief sections regarding the EV/VGI Aggregation Pilot.

II. PG&E’S CONTRIBUTIONS TO THE RECORD REGARDING THE 30 HOUR DISPATCH STRUCTURE SHOULD BE DISMISSED.

In opening testimony, PG&E states that it does not support the 30 hour per season dispatch carveout for VGI resources included in the staff concept EV/VGI Aggregation Pilot.⁸ PG&E states that “mandating IOUs to force dispatch for at least 30 hours without an emergency does not seem to align with how and why ELRP was developed.”⁹ In reply testimony, VGIC provides a considerable amount of reasoning behind why the 30-hour minimum dispatch structure is appropriate and prudent to support market transformation.¹⁰ The 30-hour minimum dispatch structure (1) provides a more consistent and predictable dispatch schedule, which can acclimate participants to VGI and (2) can target dispatch during high value time periods, including but not limited to CAISO Alert, Warning and Emergency events.¹¹ Although VGIC provided a detailed explanation in reply testimony, PG&E’s opening brief did not acknowledge the points raised by

⁸ Pacific Gas and Electric Company Emergency Reliability Order Instituting Rulemaking Errata Testimony at 7-4.

⁹ *Ibid.*

¹⁰ Reply Testimony of Ed Burgess on Behalf of the Vehicle Grid Integration Council at 7.

¹¹ Reply Testimony of Ed Burgess on Behalf of the Vehicle Grid Integration Council at 7.

VGIC or any other parties in support of the 30-hour requirement.¹² Instead, PG&E reiterated its objection to the 30-hour requirement, and did not offer additional reasoning as to why the 30-hour requirement should not be included in the EV/VGI Aggregation Pilot.¹³ As such, VGIC respectfully requests the Commission dismiss PG&E's contributions regarding the 30-hour requirement for VGI resources participating in the EV/VGI Aggregation Pilot.

III. CONCLUSION.

VGIC appreciates the opportunity to submit this reply brief and looks forward to further collaboration with the Commission and stakeholders on this effort.

Respectfully submitted,

/s/ Ed Burgess

Ed Burgess

Senior Policy Director

VEHICLE GRID INTEGRATION COUNCIL

Date: September 27, 2021

¹² Opening Brief of Pacific Gas and Electric Company (U 39 E) on Phase 2 Issues at 21.

¹³ Opening Brief of Pacific Gas and Electric Company (U 39 E) on Phase 2 Issues at 21.