

December 22, 2023

CPUC Energy Division Tariff Unit
505 Van Ness Avenue
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Re: Response of the Vehicle Grid Integration Council to Advice Letter 7083-E of Pacific Gas and Electric Company: Request to Modify Customer Eligibility Requirement for PG&E’s Vehicle-Grid Integration (VGI) Pilot #3: Microgrids Pilot.

Dear Sir or Madam:

Pursuant to the provisions of General Order 96-B, the Vehicle Grid Integration Council (“VGIC”) hereby submits this response to the above-referenced Advice Letter 7083-E of Pacific Gas and Electric Company (“PG&E”), *Request to Modify Customer Eligibility Requirement for PG&E’s Vehicle-Grid Integration (VGI) Pilot #3: Microgrids Pilot*. (“Advice Letter”) on December 5, 2023.

VGIC commends PG&E’s continued efforts to enhance overall VGI pilot efficacy and promote greater customer participation. PG&E’s VGI pilots are all critical to support customer resiliency, and Pilot #3 is certainly no exception. VGIC strongly supports the PG&E’s Advice Letter request and recommends that Energy Division Staff approve the Tier 2 Advice Letter without delay.

I. VGIC SUPPORTS PG&E’S ADVICE LETTER REQUEST AND RECOMMENDS ENERGY DIVISION STAFF APPROVE THE ADVICE LETTER WITHOUT DELAY.

The Advice Letter proposes to modify customer eligibility requirements outlined in PG&E’s Advice Letter 6753-E, filed in July 2021, which proposed a Vehicle-to-Microgrid (“V2M”) pilot (“Pilot #3”) aimed at enabling Behind-the-Meter bidirectional electric vehicles in Public Safety Power Shutoff (“PSPS”) -formed microgrids to support community resiliency.¹ On May 5, 2022, the Commission issued Resolution E-5192, which approved PG&E’s proposed Pilot #3, with

¹ PG&E Advice Letter 6259-E, *Request for Approval of PG&E’s VGI Pilots in Compliance with Decision 20-12-029*. July 15, 2021.

modifications.² As noted in PG&E’s Advice Letter, since the approval of Pilot #3, “PG&E has seen minimal buildout of PSPS specific multi-customer microgrids.”³ PG&E has identified that this issue may stem from the reduced number and severity of PSPS events per year since the pilot was first proposed by the utility in 2021. To mitigate this issue, PG&E has requested to expand eligibility in two ways:

- 1) Include microgrids outside of areas subject to PSPS.
- 2) Include single-customer microgrids that support critical facilities to encourage additional participation in, and impact of, the pilot.

VGIC fully supports PG&E’s request in Advice Letter 7083-E, as the proposed eligibility modifications are reasonable and necessary to increase participation in the pilot, yielding more valuable learnings. To that end, VGIC recommends Energy Division Staff approve PG&E’s Advice Letter 7083-E without delay.

II. CONCLUSION.

VGIC appreciates the opportunity to submit this response to the Advice Letter and looks forward to collaborating with the Energy Division and stakeholders on this important initiative.

Respectfully submitted,

/s/ Zach Woogen

Zach Woogen

Senior Policy Manager

VEHICLE GRID INTEGRATION COUNCIL

cc: Sidney Bob Dietz II Director, Regulatory Relations, c/o Megan Lawson
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Service list R.18-12-006

² CPUC Resolution E-5292, *Pacific Gas and Electric Company Advice Letter 6259-E requests approval of four vehicle-grid integration pilots pursuant to Decision 20-12-029*. May 5, 2022.

³ Advice Letter at 2.