



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

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Order Instituting Rulemaking to  
Consider Alternative-Fueled Vehicle  
Programs, Tariffs, and Policies.

Rulemaking 13-11-007  
(Filed November 14, 2013)

**OPENING COMMENTS OF KNGRID ON THE PROPOSED  
DECISION OF COMMISSIONER PETERMAN MAILED  
OCTOBER 3, 2016**

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**I. Introduction**

KnGrid appreciates the opportunity to provide comments on the California Public Utilities Commission's (CPUC or the Commission) Proposed Decision of Commissioner Peterman mailed October 3, 2016. Further, we want to express our deep appreciation for the swift and decisive action shown by the Commission in the September 14, 2016 Ruling.

## **II. Background**

KnGrid's mission is to accelerate revolution-scale adoption of plug-in electric vehicles (PEVs) by simplifying the consumer refueling experience while enabling grid-friendly smart charging based on the ISO 15118 global VGI interoperability standard. In February 2016, the company entered into a Joint Venture with innogy New Ventures, a U.S. subsidiary of RWE GmbH, a global energy leader based in Germany. The company participates on VGI standards committees as well as EPRI's Infrastructure Working Council. The company currently operates a CEC demonstration project at UC San Diego of 26 AC Level 2 charging stations that employ the standard. Currently, over 80 ISO 15118 vehicles are on campus and using these charging stations. Further the Company has developed the world's first Demand Clearinghouse (DCH) to enable any utility, balancing authority or site host to provide pricing and grid constraints to all connected vehicles via a single cloud-based data connection. Utilities can connect to the DCH with whichever smart grid or demand

response protocol they prefer (Currently OpenADR 2.0b, which all 3 IOUs have implemented, but can also support other smart grid protocols), providing a simple solution to cover the entire state.

### **III. Comments on the September 14, 2016 Ruling**

#### **A. Strengths of the Ruling**

KnGrid asserts that the Commissioner acted wisely to encourage California's Investor Owned Utilities to conform charging infrastructure investments to a common and unique Vehicle-Grid Integration (VGI) communications standard (ISO 15118) for the following reasons:

- **Broad Industry Support:** Several parties supported the ISO 15118 standard in Opening Comments: BMW and VDA (the German Automaker Association that includes BMW, Volkswagen Group [VW, Audi, Porsche], Daimler and Ford Europe), CSE and ChargePoint. No other VGI communications standard received support from parties.
- **Accelerates PEV Adoption with a simplified refueling experience:** It supports the kind of consumer refueling simplicity needed to summon revolution-scale market uptake by removing fragmentation. In other words, OEMs can manufacture ISO 15118 vehicles with the confidence that their customers will find ISO 15118 charging stations. This supports Governor Brown's Executive Order on Zero-Emission Vehicles.

- **Avoids violation of Article 2 - Rates Section 740.12 (c)**<sup>1</sup> of the California Public Utilities Code which states: “The commission shall review data concerning current and future electric transportation adoption and charging infrastructure utilization prior to authorizing an electrical corporation to collect new program costs related to transportation electrification in customer rates. If market barriers unrelated to the investment made by an electric corporation prevent electric transportation from adequately utilizing available charging infrastructure, the commission shall not permit additional investments in transportation electrification without a reasonable showing that the investments would not result in long-term stranded costs recoverable from ratepayers.” By providing a global international VGI standard as guidance for utilities to conform their investment plans to (that multiple parties supported in comments), utilities can avoid double investments in this infrastructure while simultaneously providing scale economies that lower equipment costs.
- **Attacks the ‘chicken-egg’ dilemma:** OEMs can build to the standard with confidence in the availability of matching charging stations needed to enable smart charging and automatic authentication.
- **Enables ‘Collaboration on the standard, competition on implementation’:** The ISO 15118 communications standard fosters

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<sup>1</sup> <http://law.justia.com/codes/california/2015/code-puc/division-1/part-1/chapter-4/article-2/section-740.12>

development of new potential business models by OEMs, EVSPs and other emerging eMobility service providers and aggregators. The design fully supports Rule 21 Interconnection by creating a Distributed Energy Resource (DER) model that associates the energy meter with the vehicle's battery automatically. A common standard enables industry actors to unleash new ideas and business models in a scaled-up refueling ecosystem where PEV batteries and meters associate the same way, every time.

B. Potential Legal Weakness of the Ruling:

KnGrid respectfully points out that, while the Ruling heads in the right direction, the 11 criteria in Appendix B could provide the false sense that State goals could be ensured via a work-around. Rather than conforming to the standard, which aligns with SB 350's aggressive timeline to reduce GHG emissions 40% below 1990 levels by 2030, some parties may engage in an effort to 'do it another way.' Clearly, SB 350 compels the State to move swiftly and decisively.

PUC Code 740.12(c) forces investment decisions to be made that avoid stranded investments. If utilities are allowed to invest in non-ISO 15118 charging stations, PEV owners will face a fragmented charging station ecosystem and these stations may need to be replaced forcing ratepayers to invest twice.

**IV. Conclusion**

KnGrid greatly appreciates the Commission's continued support for implementation of California's groundbreaking SB 350 law. Our implementation, while vital to global

success in addressing the problem, will mean little if we don't inspire others to follow our lead. By embracing a globally-developed VGI standard, we send yet another signal to the world that our efforts here, while local in implementation, are global in significance.

Respectfully submitted,  
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