STATE OF CALIFORNIA GAVIN NEWSOM, *Governor*

PUBLIC UTILITIES COMMISSION

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TO PARTIES OF RECORD IN RULEMAKING 18-12-006:

This is the proposed decision of Commissioner Clifford Rechtschaffen. Until and unless the Commission hears the item and votes to approve it, the proposed decision has no legal effect. This item may be heard, at the earliest, at the Commission's December 17, 2020 Business Meeting. To confirm when the item will be heard, please see the Business Meeting agenda, which is posted on the Commission's website 10 days before each Business Meeting.

Parties of record may file comments on the proposed decision as provided in Rule 14.3 of the Commission's Rules of Practice and Procedure.

/s/ ANNE E. SIMON
Anne E. Simon
Chief Administrative Law Judge

AES:gp2

Attachment

PROPOSED DECISION

Agenda ID #18973
Quasi-Legislative

Decision **PROPOSED DECISION OF COMMISSIONER RECHTSCHAFFEN**
(Mailed 11/13/2020)

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking to Continue the Development of Rates and Infrastructure for Vehicle Electrification.	Rulemaking 18-12-006

DECISION CONCERNING IMPLEMENTATION OF SENATE BILL 676 AND VEHICLE-TO-GRID INTEGRATION STRATEGIES

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DECISION CONCERNING IMPLEMENTATION OF SENATE BILL 676 AND VEHICLE-TO-GRID INTEGRATION STRATEGIES

Summary

This decision adopts strategies and metrics to further the integration of electric vehicles as electrical grid resources, and fulfills obligations imposed on the Commission by Senate Bill 676 (Ch. 484, Stats. 2019). This proceeding remains open.

1. Background

Senate Bill 676 (Ch. 484, Stats. 2019) (SB 676) requires the Commission to establish strategies and quantifiable metrics to maximize the use of feasible and cost-effective electric vehicle (EV) integration into the electrical grid by January 1, 2030. Prior to the enactment of SB 676, the Commission helped to create a vehicle-grid integration working group (VGI WG) that sought to identify recommendations for further EV integration into the electrical grid generally.

The oversight of the VGI WG is part of Rulemaking (R.) 18-12-006. The instant rulemaking was established by the Commission on its own motion by an Order Instituting Rulemaking (OIR) issued on December 19, 2018. This proceeding is intended to provide a framework for the Commission to consider utility applications for investments and rates related to zero emission vehicles, and also includes issues held over from the predecessor transportation electrification proceeding –R.13-11-007.

A recent decision (D.) in the instant proceeding – D.20-09-025 – summarizes the procedural background and is incorporated by reference.

On July 20, 2020 an assigned Administrative Law Judge (ALJ) issued an email ruling seeking party comment on issues related to VGI to allow the Commission to fulfill its obligations under SB 676. The email ruling also attached the final report of the VGI WG and invited parties to use the report as a

basis for their SB 676 proposals. Opening comments were filed on August 17, 2020 and reply comments were filed on August 31, 2020. This decision is based on the record provided by party comments on the SB 676 email ruling as well as on the contents of the VGI WG final report and party comments on VGI-related topics in the draft Transportation Electrification Framework.

Specifically, the SB 676 email ruling sought party feedback on the following questions in light of the VGI WG final report:

1) Should the Commission adopt a revised definition for "electric vehicle grid integration" to replace the definition in Public Utilities Code Section 740.16(b)(1)? If so, what should it be?

2) Which strategies should the Commission adopt by the end of 2020 pursuant to Public Utilities Code Section 740.16(c) to maximize the use of feasible and cost-effective electric vehicle grid integration by January 1, 2030? Parties should explain how each recommended strategy is feasible and cost-effective.

3) For each strategy recommended, what quantifiable metric or metrics should be adopted to measure progress in furthering the strategy under Public Utilities Code Section 740.16(j)?

4) For each strategy recommended, parties should specify how the strategy: a) accounts for the effect of time-of-use rates on electricity demand from electric vehicle charging, b) is in the best interests of ratepayers, as defined in Public Utilities Code Section 740.8, and consistent with Public Utilities Code Section 451, c) reflects electrical demand attributable to electric vehicle charging, including from existing approved rates and programs, d) is consistent with the transportation electrification goals described in Public Utilities Code Section 740.12, and e) incorporates the National Institute of Standards and

Technology's reliability and cybersecurity protocols, or other equally protective or more protective cybersecurity protocols.

On August 10, 2020 one of the assigned ALJs issued an email ruling attaching a proposal from the Commission's Energy Division staff (VGI staff paper) regarding VGI issues. The VGI staff paper was intended to supplement the original VGI proposals and questions posed in the draft Transportation Electrification Framework (TEF) attached to an ALJ ruling of February 3, 2020. Parties were invited to comment on the VGI staff paper in order to develop a record for decisions on VGI issues more broadly.

The following parties served and filed opening comments on the SB 676 ruling on August 17, 2020: San Diego Gas & Electric Company (SDG&E), Southern California Edison Company (SCE), PacifiCorp, Small Business Utility Advocates (SBUA), Joint Commenters,[1] Union of Concerned Scientists (UCS), the Public Advocates Office at the California Public Utilities Commission (Cal Advocates), and Pacific Gas and Electric Company (PG&E). Reply comments were served and filed by the following parties by August 31, 2020: PG&E, SDG&E, Plug In America, Tesla, Inc., Utility Consumers' Action Network (UCAN), Joint Commenters, SBUA, UCS, Fermata, LLC (Fermata), and SCE.

1.1. Background on the VGI Working Group

The VGI WG worked collaboratively between August 2019 and June 2020, held seven workshops, and was made up of diverse representatives of 85 VGI stakeholders, including state agencies, utilities, community choice aggregators, the California Independent System Operator (CAISO), EV manufacturers, battery

[1] Consisting of Advanced Energy Economy, ChargePoint, Inc., Siemens, Enel X North America, Inc., California Energy Storage Alliance, Environmental Defense Fund, Vehicle-Grid Integration Council, Greenlots, and Natural Resources Defense Council.

manufacturers, charging network and energy service providers, advocacy and research groups, industry associations, and ratepayer interest groups.

The VGI WG focused on answering three core questions:

1. What VGI use cases can provide value now, and how can that value be captured?
2. What policies need to be changed or adopted to allow additional use cases to be deployed in the future?
3. How does the value of VGI use cases compare to other storage or distributed energy resources (DERs)?

As a part of its work, the VGI WG developed a final report on strategies and recommendations to further EV integration into the electrical grid generally and also identified certain recommendations that the VGI WG believed were consistent with SB 676. The final report was served on the parties to this proceeding on June 30, 2020 and was attached to the SB 676 email ruling.

The VGI WG final report identified a number of potential benefits as motivations for pursuing VGI:[2]

- Accelerating the adoption of EVs by providing additional revenue streams that lower the total cost of vehicle ownership for individual owners and fleet operators.
- Reducing costs to electricity ratepayers by reducing congestion on existing power distribution infrastructure and costly distribution system upgrades, as well as reducing the need to invest in new fossil-fuel electricity generation.
- Supporting further decarbonization of the electric sector by avoiding curtailment of renewables and providing grid services.
- Accelerating reduction of carbon and criteria pollutant emissions in the transportation sector.

[2] VGI WG Final Report at 6.

- Improving grid resiliency and security, including for public safety power shutoff (PSPS) events.

2. Issues Before the Commission

Per the Assigned Commissioner's Scoping Memo and Ruling (scoping memo) filed May 2, 2019 in this proceeding, the development and adoption of VGI policy and technologies is within the scope of this proceeding.[3] The scoping memo also determined that implementation of legislatively-mandated statewide transportation electrification goals, including legislation adopted after the issuance of the scoping memo, was within scope.

As a result, consideration of the Commission's implementation of SB 676 is properly within the scope of this proceeding, as is the more general establishment of non-SB 676[4] strategies related to VGI. This decision is a first step toward maximizing VGI. Future Commission decisions may adopt additional VGI strategies or modify those adopted in this decision.

3. Executing SB 676

SB 676 imposes several duties on the Commission, electrical corporations, and community choice aggregators. In this decision, the Commission executes the following mandates imposed on it by SB 676:

- Consider whether to adopt a revised definition for "electric vehicle grid integration" to replace the definition in Public Utilities Code Section[5] 740.16(b)(1).[6]

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[3] Scoping memo at 6.

[4] Non-SB 676 VGI strategies are those adopted pursuant to the Commission's authority to promote VGI, but that do not necessarily meet the cost-effectiveness and feasibility requirements of SB 676.

[5] All further references to "Section" are to sections of the Public Utilities Code unless otherwise specified.

[6] Section 740.16(b)(4).

- Establish strategies and quantifiable metrics to maximize the use of feasible and cost-effective electric vehicle grid integration by January 1, 2030 consistent with all of the following:
  - The electric vehicle grid integration strategies shall account for the effect of time-of-use rates on electricity demand from electric vehicle charging.
  - Expenditures on electric vehicle grid integration shall be in the best interests of ratepayers, as defined in Section 740.8, and consistent with Section 451.
  - The electric vehicle grid integration strategies shall reflect electrical demand attributable to electric vehicle charging, including from existing approved rates and programs.
  - Electric vehicle grid integration shall be consistent with the transportation electrification goals described in Section 740.12.[7]
- Consider incorporating the National Institute of Standards and Technology's reliability and cybersecurity protocols, or other equally protective or more protective cybersecurity protocols, into the electric vehicle grid integration strategies.[8]

Each of these mandates is considered in turn below.

4. Revising the Definition of Electric Vehicle Grid Integration

Section 740.16(b)(1) states "[f]or purposes of this section, 'electric vehicle grid integration' means any method of altering the time, charging level, or location at which grid-connected electric vehicles charge or discharge, in a manner that optimizes plug-in electric vehicle interaction with the electrical grid and provides net benefits to ratepayers by doing any of the following:

(A) Increasing electrical grid asset utilization.

(B) Avoiding otherwise necessary distribution infrastructure upgrades.

[7] Section 740.16(c).

[8] Section 740.16(c)(5).

(C) Integrating renewable energy resources.

(D) Reducing the cost of electricity supply.

(E) Offering reliability services consistent with Section 380 or the Independent System Operator tariff."

Section 740.16(b)(4) grants the Commission the authority to alter the statutory definition of VGI. Several parties recommend potential changes to the definition in the comments on the SB 676 ruling. For example, PG&E suggests several additions to the definition:

- adding the term "cost-effective" to define the conforming methods in the first sentence,
- adding a term to ensure that any methods are "consistent with grid safety and reliability,"
- refining the term "ratepayers" to mean "participating and non-participating ratepayers,"
- adding the term "and operational flexibility" to condition (A),
- adding the term "the resources adequacy requirements established by" before the words "Section 380" in condition (E), and
- adding two additional use cases to the end of the definition, namely:
- (F) Enabling resilience and customer services.
- (G) Increase the economic, social, or environmental benefits associated with transportation electrification.[9]

SDG&E suggests adding "resiliency services" to the terms of condition (E).[10] They also argue that any revised definition should emphasize that VGI strategies should not require the use of any specific technology and that

[9] PG&E opening comments at XX.

[10] SDG&E opening comments at 7.

VGI may be achieved using multiple strategies, including, but not limited to, the adoption of an electrical rate design, a technology, or a customer service.[11]

SCE also suggests explicitly including resiliency in a revised definition, noting the support for the application of VGI for resiliency purposes in the final report of the VGI WG.[12] SCE suggests including a new condition with the following language: "Offering resiliency services which could provide system wide, local or customer-level energy solutions if the grid undergoes an accidental or intentional outage and is not available."

UCS recommends adding "electric vehicle freight equipment" as a technology that charges or discharges under the VGI definition. They also propose an amendment that would codify the desirability of EV driver and fleet operator benefits alongside ratepayer benefits. Tesla, Inc. (Tesla) concurs that codification of a driver benefit is desirable.[13] Finally, UCS seeks the inclusion of a new condition (F), "Reduction of health and environmental impacts from air pollution."[14]

The Joint Commenters seek the inclusion of a new condition (F), "Increase the economic, social or environmental benefits associated with transportation electrification."[15] Fermata supports this inclusion in addition to the addition of a resiliency use-case to the definition.[16]

SBUA supports the following additions to the definition:

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[11] SDG&E reply comments at 2.

[12] SCE opening comments at 2.

[13] Tesla reply comments at 2-3.

[14] UCS opening comments at 2-4.

[15] Joint Commenters opening comments at 7.

[16] Fermata reply comments at 7-8.

- adding the term "and operational flexibility" to condition (A),
- adding the term "the resources adequacy requirements established by" before the words "Section 380" in condition (E), and
- adding a new condition (F), "Enable services for customers including resiliency and avoiding public safety power shutoffs."[17]

SBUA asserts that the above proposed additions are relatively non-controversial and enjoyed support from VGI WG members. However, SBUA also offers for consideration certain additional conditions to include at the end of the definition:

> (G) Enabling reduction of peak demand during peak load periods through modifiable charging rates and charging times.
>
> (H) Providing energy storage to facilitate integration of intermittent sources of energy.
>
> (I) Varying the rate of charging or discharging so as to provide ancillary services for the grid, such as reactive power optimization, operating reserves, and frequency regulation.
>
> (J) Varying the rate of charging or discharging so as to diminish transmission system requirements.[18]

PacifiCorp does not support any changes to the definition at this time, but noted the need for definitional flexibility in the future.[19]

There is widespread support amongst the parties for some modifications to the definition of VGI, but there is some dispute about the particular changes to be made. One modification supported by many parties is the addition of a reference to the ability of VGI systems to provide resiliency in the face of disruptions to electricity supplies.

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[17] SBUA opening comments at 3; SBUA reply comments at 3.

[18] SBUA opening comments at 4.

[19] PacifiCorp opening comments at 2-3.

Because VGI can provide resiliency services, and because it is desirable to advance resiliency in electrical systems as a matter of policy, the addition of resiliency to the statutory definition of VGI is reasonable and should be approved. This decision therefore modifies the definition of VGI appearing in Section 740.16(b)(1) to add language to the end of subsection (B) that reads "and supporting resiliency."

PG&E's recommendation that the language of Section 740.16(b)(1)(A) – "Increasing electrical grid asset utilization" – be modified to include the term "operational flexibility" is also reasonable and should be approved. This is because the term "grid asset utilization" has several different meanings that may not include operational flexibility. Including the term "operational flexibility" clarifies that VGI can provide this specific service to electrical grid operators in the event electrical resources are constrained. Section 740.16(b)(1)(A) should now read "Increasing electrical grid asset utilization and operational flexibility."

As alluded to by UCS in their comments, it may be necessary to clarify that various forms of electrified transportation may be considered as VGI resources. A recent Commission decision, D.20-09-025, in this proceeding specifically defined the various types of electrified transportation that the Commission seeks to promote in accordance with Section 740.12. These types of electrified transportation are: light-duty electric vehicles, medium-duty electric vehicles, heavy-duty electric vehicles, off-road electric vehicles, and off-road electric equipment.[20] Because Section 740.16(b)(1) only refers to "grid-connected electric vehicles," it is possible, as UCS suggests, that this term could be misconstrued in the future and read as not including some of the forms of electric transportation

[20] As defined in D.20-09-025 at 9/-10, 24.

recently defined by D.20-09-025. In order to avoid any future confusion, the definition of VGI is modified so that "grid-connected electric vehicles" is changed to read "grid-connected light-duty electric vehicles, medium-duty electric vehicles, heavy-duty electric vehicles, off-road electric vehicles, or off-road electric equipment." These terms should be assumed to have the meanings described in D.20-09-025.

Several other potential modifications to the statutory definition of VGI were offered by parties but are not adopted by this decision. Parties should not assume that this decision's rejection of certain proposals constitutes a rejection of those ideas in the abstract. This decision's modification of the statutory definition of VGI is non-prejudicial with respect to other features of VGI advanced by the parties that may be considered by the Commission.

The final definition of VGI appearing in Section 740.16, and as modified by this decision, is as follows:

"Electric vehicle grid integration" means any method of altering the time, charging level, or location at which grid-connected light-duty electric vehicles, medium-duty electric vehicles, heavy-duty electric vehicles, off-road electric vehicles, or off-road electric equipment charge or discharge, in a manner that optimizes plug-in electric vehicle or equipment interaction with the electrical grid and provides net benefits to ratepayers by doing any of the following:

(A) Increasing electrical grid asset utilization and operational flexibility.

(B) Avoiding otherwise necessary distribution infrastructure upgrades and supporting resiliency.

(C) Integrating renewable energy resources.

(D) Reducing the cost of electricity supply.

(E) Offering reliability services consistent with the resource adequacy requirements established by Section 380 or the Independent System Operator tariff.

5. Strategies

At the heart of SB 676 is the requirement that the Commission adopt strategies that promote VGI by January 1, 2030. Parties proposed a variety of strategies for adoption by the Commission, and many of these were discussed in detail in the VGI WG final report. In general, parties relied on the discussion and findings of the VGI WG final report to confirm that certain VGI strategies had value and should be pursued. This decision incorporates by reference the discussion surrounding adopted strategies in the VGI WG final report, and the report is attached to this decision at Appendix A.

Many parties referred to the VGI WG's agreed upon categories of policy priorities for advancing VGI. These 11 policy areas are:

1. Reform retail rates.
2. Develop and fund government and load-serving entity (LSE) customer programs, incentives, and DER procurements.[21]
3. Design wholesale market rules and access.
4. Understand and transform VGI markets by funding and launching data programs, studies, and task forces.
5. Accelerate use of EVs for bi-directional non-grid-export power and public safety power shut-off resiliency and backup.
6. Develop EV bi-directional grid-export power including interconnection rules.
7. Fund and launch demonstrations and other activities to accelerate and validate commercialization.

[21] Load serving entities include investor-owned utilities, community choice aggregators, publicly owned utilities, and others.

8. Develop, approve, and support adoption of technical standards not related to interconnection.
9. Fund and launch market education & coordination.
10. Enhance coordination and consistency between agencies and state goals.
11. Conduct other non-VGI-specific programs and activities to increase EV adoption.[22]

The VGI staff paper asserted that these 11 categories of policies will collectively support five objectives leading to increased VGI:

1. Market signals to create market demand.
2. Demonstrate early stage technology development and evaluate data to show market readiness.
3. Adopt standards to enable VGI services.
4. Overcome capital costs, infrastructure, information, and other barriers to scaling VGI services.
5. Continue agency coordination.[23]

The 11 categories of policy priorities support laudable policy objectives and the Commission agrees that these are a useful foundation for the promotion of VGI.[24]

In this decision, the Commission adopts strategies for the promotion of VGI that are shown to be cost-effective and feasible, and therefore adopted pursuant to SB 676. This decision also adopts VGI strategies that may not have been shown to be cost-effective and feasible at this time, with the understanding that additional information would be needed to determine cost-effectiveness

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[22] VGI WG Final Report at 9; PG&E reply comments at 2-3.

[23] Vehicle Grid Integration Implementation and the Draft Transportation Electrification Framework Energy Division Staff Paper at 3.

[24] PG&E states that these categories are a useful foundation for determining policy actions for the promotion of VGI (PG&E reply comments at 3).

and/or feasibility. While those additional VGI strategies are not, strictly speaking, adopted pursuant to SB 676,[25] this decision nonetheless orders the large electrical corporations to pursue those strategies using the Commission's authority to promote VGI.[26] The rationale for this determination and hybrid approach to VGI strategy selection is described in more detail later in this decision.

5.1. Reform Retail Rates

This first policy objective recommended by the VGI WG is to reform retail rates. The VGI WG reports that reforming retail rates "can support both 'indirect' use cases, for which charging decisions can be based on time-varying price signals (such as [time-of-use (TOU)] rates), and 'direct' use cases where new rates can improve cost-effectiveness or provide new incentives for managed charging."[27]

Parties were broadly supportive of adopting a VGI strategy of reforming retail rates to help advance VGI, noting that retail rates are inherently cost-effective.[28] Joint Commenters sought specific reforms to retail rates including dynamic commercial and residential EV rates.[29] UCS argued that using retail rates to advance VGI would be low-cost and lead to a "tremendous amount of

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[25] Joint Commenters reply comments at 7-8 ("…the [VGI] WG's efforts should be seen a useful effort to inform, not prescribe, the path forward for SB 676 implementation," arguing that Commission adoption of VGI strategies related to rates, programs, and market mechanisms would fulfill the requirements of SB 676). *See also* Pub. Util. Code § 701.

[26] Large electrical corporations refers to the large electric investor-owned utilities: PG&E, SCE and SDG&E.

[27] VGI WG Final Report at 34.

[28] *See, e.g.*, UCAN reply comments at 5-7; Tesla reply comments at 3-4.

[29] Joint Commenters opening comments at 10-11.

potential value."[30] SDG&E asserted that time-varying rates are "a proven approach for minimizing the cost and maximizing the benefits of serving [EV] load."[31] PG&E referred to managed EV charging based on price signals as a "low-cost integration solution[]" that should be explored further.[32]

In addition, SB 676 itself finds that TOU rates can reduce costs or mitigate costs increases for all ratepayers, which is inherently cost effective.[33]

Reforming retail rates as a VGI strategy pursuant to SB 676 is reasonable. This is because reforming retail rates is feasible and low-cost with high potential benefit, as demonstrated by the parties. While there are a variety of approaches to reforming retail rates in a manner that may assist VGI, some parties focused on the development of optional dynamic pricing rates. Given that the Commission is currently reviewing potential dynamic pricing rates for SDG&E and PG&E EV customers,[34] it is reasonable and efficient to pursue optional dynamic pricing structures for EV customers to promote VGI.

The strategy of reforming retail rates applicable to EVs, with a particular focus on optional dynamic pricing structures, is hereby adopted by the Commission pursuant to SB 676. A future Commission decision regarding the rates section 9.1 of the draft TEF (Electric Vehicle Rate Evolution Plan

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[30] UCS opening comments at 7.

[31] SDG&E opening comments at 1.

[32] PG&E opening comments at 3.

[33] Section 740.16(a)(1)(D) ("Time-of-use rates for customers with electric vehicles can reduce costs or mitigate cost increases for all ratepayers due to increased usage of electric vehicles by incentivizing electric vehicle charging at periods of low demand and low grid congestion").

[34] PG&E opening comments at 4. *See also* A.20-10-011.

Development Guidance) and/or other decisions may provide additional direction regarding rate reforms applicable to EVs.[35]

5.2. Develop and Fund Government and Load-Serving Entity Customer Programs, Incentives, and Distributed Energy Resource Procurements

The VGI WG stated that developing and funding customer programs and incentives can support scale-up and cost reduction of already-commercial VGI solutions for most existing use cases.[36] Clearly, providing incentives for the deployment of VGI technology will encourage the development and deployment of VGI technology. It is uncertain, however, whether the creation of stand-alone incentive programs or expansion of existing programs by the Commission in this decision would be cost-effective. Without particular budgets or program goals to consider – and none were offered by the parties in their responses to the SB 676 ruling – it is impossible to judge cost-effectiveness under SB 676 in this decision.

However, it is appropriate for the Commission to adopt this policy objective as a non-SB 676 VGI strategy given its ability to advance VGI more generally. The large electrical corporations shall report on their policy actions such as customer programs and incentives related to VGI. The reports shall not be limited to programs and incentives that are required by this decision[37] when reporting on VGI strategies adopted by this decision pursuant to SB 676. These

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[35] We also note that the California Energy Commission (Energy Commission) has proposed a "Load Management Tariff" under Energy Commission 19-OIR-01 that would, if finalized, impose requirements regarding TOU rates.

[36] VGI WG Final Report at 34.

[37] A number of programs and incentives or potential programs and incentives that are not required by this decision are identified in the VGI staff paper at Appendix B, and in Party comments as described in section 15.1 of this decision.

reporting requirements are discussed in more detail in section 15.1 of this decision.

5.3. Design Wholesale Market Rules and Access

The VGI WG reports that designing wholesale market rules and access would support VGI "use cases for system applications, including a wide variety of grid services, from day-ahead and real-time energy to resource adequacy, renewable energy integration, and grid upgrade deferrals."[38] As noted by the report, CAISO is the lead agency for determining wholesale electricity market rules and access, with the Commission and large electrical corporations playing a supporting role.

Because the Commission and large electrical corporations cannot independently set wholesale market rules and access for VGI applications, the Commission does not adopt this strategy pursuant to SB 676. However, the Commission notes the VGI WG's interest in this area and confirms that the strategy should be adopted as a non-SB 676 VGI strategy given its ability to align wholesale market signals with VGI applications (similar to the way in which retail rates can be modified to advance VGI goals). Therefore, the large electrical corporations shall collaborate with CAISO where beneficial and report on reforms to wholesale market rules and access that advance VGI strategies. These reporting requirements are discussed in more detail in section 15.1 of this decision.

[38] *Id.*

5.4. Pilots, Demonstrations, Emerging Technology, and Studies

Two of the 11 categories of policies enumerated by the VGI WG concern VGI pilots, demonstrations, emerging technology, and studies.[39] Many parties agreed that further pilots, demonstrations, an emerging technology program and studies would be helpful in refining some VGI strategies for the future; while some also cautioned against the risk of "over-piloting" strategies ready for scale deployment.[40]

This decision finds that pursuit of VGI pilots, demonstrations, emerging technologies, and studies is a reasonable VGI strategy and should be adopted as a non-SB 676 VGI strategy. While these activities will support the development of cost-effective and feasible technology, they may not provide immediately quantifiable cost-effective benefits. The pursuit of these activities will advance VGI, as defined by this decision, by ensuring that proven VGI technologies can be scaled and by expanding the technology required to advance VGI.[41]

For the purpose of clarity, VGI pilots are intended to establish that proven VGI technologies can be effectively scaled up. VGI demonstrations are intended to prove that VGI technologies that have been effective in small-scale research projects are effective in "real-world" circumstances. VGI emerging technologies are those that have not yet been demonstrated in the real world, or where specific research (not including field demonstrations or pilots) is needed to determine the ability to apply the technology in programs. VGI studies may

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[39] VGI WG Final Report at 9, policy recommendation categories #4 and #7.

[40] *See, e.g.*, SCE opening comments at 3; PG&E opening comments at 5; SBUA opening comments at 4; Joint Commenters reply comments at 9 (conditioning support on mitigating the risk of "over-piloting").

[41] *See* PG&E opening comments at 4.

relate to and augment any of these three categories, particularly around the topic of cost-effectiveness data that the VGI WG identified as a priority data gap.

The large electrical corporations are authorized to propose a variety of VGI pilots and an emerging technologies program to address needs that fall outside of the scope of other state programs as described in sections 6.4 and 6.8. These activities shall facilitate the development of VGI strategies (or novel use cases for a given strategy) where pilots are needed. As noted by Joint Commenters reply comments,[42] these activities should not delay the implementation of VGI strategies ready for deployment at scale now.

In addition, the large electrical corporations shall report on the use the Electric Program Investment Charge (EPIC) and/or other sources of funding for VGI technology demonstration projects. Future priorities for EPIC are under consideration in R.19-10-005. If future VGI technology demonstrations are not funded by EPIC, or some other funding source, the Commission may revisit the need for additional action in order to implement this strategy.

5.5. Accelerate Use of EVs for Bi-Directional Non-Grid-Export Power and PSPS Resiliency and Backup

The VGI WG reports that accelerating the use of EVs for bi-directional non-grid-export power and PSPS resiliency and backup would support broader goals around customer resiliency.[43] This strategy would allow customers to use their EVs to power their homes or facilities during outages and potentially support other use cases by removing non-EV load from the grid. Many parties support

[42] Joint Commenters reply comments at 9.

[43] VGI WG Final Report at 34.

this VGI strategy in principle,[44] even as some parties argue that more pilots and demonstrations in this area are necessary to demonstrate cost-effectiveness and potentially other attributes.[45]

Given broad party support for this VGI strategy in principle, and this decision's inclusion of the enhancement of resiliency as part of VGI's defined attributes (see Section 4 above), it is reasonable to adopt the VGI WG's resiliency objective as a non-SB 676 VGI strategy. Due to the lack of data concerning cost-effectiveness, it cannot be adopted as a SB 676 strategy at this time.

The large electrical corporations shall report on their efforts to accelerate the use of VGI for resiliency purposes when reporting on VGI strategies adopted by this decision pursuant to SB 676 (including but not limited to reporting on pilots and technology demonstrations where necessary, and potential programs outside of the DRIVE OIR identified in the VGI staff paper (Appendix B)). These reporting requirements are discussed in more detail in section 15.1 of this decision.

A proposed decision in this proceeding on authorized expenditures of low carbon fuel standard (LCFS) revenues also addresses the potential of EVs to support enhanced resiliency. The large electrical corporations are encouraged to integrate the holdings of that decision related to the definition and policy importance of resiliency when designing their pilots and technology demonstrations pursuant to this VGI strategy.

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[44] Joint Commenters opening comments at 10; UCAN reply comments at 4; SBUA opening comments at 5.

[45] PG&E opening comments at 3 ("PG&E also recommends evaluating enabling resiliency services for customers (*i.e.,* electric vehicles as backup power during PSPS events) once determined that these services are cost-effective, reliable and compliant with safety and cybersecurity standards").

5.6. Interconnection Reform

The VGI WG reports that the use of EVs to provide bi-directional grid-export power, including development of necessary interconnection rules, is a desirable policy objective. In this strategy, customers use EVs to provide power directly to the grid. The final report states that this objective would support grid-facing use cases, such as system renewable energy integration, system resource adequacy, and system ancillary services like frequency regulation.[46]

Practically speaking, this objective seeks to reform interconnection rules to allow for integration of EVs into the grid for the purpose of providing grid-related services. Such services were adopted earlier in this decision as non-SB 676 VGI strategies, such as the advancement of VGI to provide resiliency and back-up power services. Adopting this strategy is therefore complementary to, and as suggested by some parties a condition precedent for, achieving other VGI strategies.[47]

Because the reform of interconnection rules related to VGI services is low cost and feasible to pursue, this strategy is adopted by this decision as a VGI strategy pursuant to SB 676. Most of these reforms should be addressed in the Commission's dedicated proceeding on interconnection and Electric Rule 21 – R.17-07-007.

Pursuant to SB 676, the large electrical corporations shall report on progress to reform interconnection to facilitate VGI in annual reporting. The large electrical corporations may, if they choose, fulfill this order by

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[46] VGI WG Final Report at 34.

[47] Fermata reply comments at 8-10 (noting the interconnection needs for certain forms of vehicle-to-grid technology); PG&E opening comments at 3 ("[a]ll of the [VGI WG's 11 policy] objectives require more concrete, practical analysis and evaluation…as well as basic grid interconnection").

cross-referencing to any Rule 21 reports that they may file in other proceedings. The large electrical corporations shall also report on progress to reform interconnection rules to advance VGI in their annual VGI reporting ordered by this decision. These reporting requirements are discussed in more detail in section 15.1 of this decision.

5.7. Develop, Approve, and Support Adoption of Technical Standards Not Related to Interconnection

The VGI WG reports that the development, approval, and adoption of technical standards not related to interconnection are important policy goals to advance VGI.[48] This decision finds that development of such standards should be a non-SB 676 VGI strategy given that the development of new technology typically requires the adoption or revision of one or more technical standards.

Because the development, support and approval of non-interconnection technical standards related to VGI services is generally low cost and is feasible to pursue, this strategy is adopted by this decision as a VGI strategy pursuant to SB 676. Pursuant to SB 676, the large electrical corporations shall report on support and adoption of non-interconnection technical standards in annual reporting. These reporting requirements are discussed in more detail in section 15.1 of this decision.

5.8. Marketing, Education and Outreach

The VGI WG reports that a policy objective of funding and launching market education and coordination would help to advance VGI.[49] Several parties argued in their comments that enhancing VGI customer outreach and education

[48] VGI WG Final Report at 9.

[49] *Id.*

would benefit VGI by encouraging more EV drivers to participate in VGI programs.[50]

Increasing the number of customers participating in VGI would increase the amount of electricity available to provide grid services and benefit VGI implementation. Reaching out to EV drivers and encouraging their participation would therefore help to advance VGI and its broader goals.

While customer outreach and education are doubtlessly feasible, the cost-effectiveness of such outreach cannot be established without more detail on the particular outreach proposed and the aim of the outreach.[51] In addition, this topic largely overlaps with the draft TEF Section 11.2 on ME&O and should be considered in any future Commission decision on this portion of the draft TEF. This decision therefore adopts VGI customer outreach and education as a non-SB 676 VGI strategy. The large electrical corporations shall report on their efforts to fund and launch VGI customer outreach and education when reporting on VGI strategies adopted by this decision pursuant to SB 676. These reporting requirements are discussed in more detail in section 15.1 of this decision.

5.9. VGI WG Policy Recommendations not Adopted as VGI Strategies

The final two categories of policy recommendations by the VGI WG are not adopted by this decision as VGI strategies. These two categories of recommendations are: 1) enhance coordination and consistency between agencies and state goals, and 2) conduct other non-VGI-specific programs and activities to increase EV adoption.

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[50] Joint Commenters opening comments at 13; UCS opening comments at 12 ("[customer outreach] is so critical that it merits its own strategy").

[51] *See, e.g.,* PG&E opening comments at 3.

Although the Commission intends to coordinate with other agencies on VGI strategies, this decision does not designate such cooperation as a formal VGI strategy as the Commission does not have the authority to order other state agencies to pursue these activities. Nevertheless, this decision encourages Commission staff to continue working with sister state agencies in pursuing VGI strategies, including but not limited to the Energy Commission's development of the VGI Roadmap Update, and attempt to harmonize VGI regulations where feasible.

The second of the two categories of recommendations is not adopted as a formal VGI strategy because, by definition, the individual recommendations in this category are primarily aimed at promoting broader EV and TE infrastructure adoption and not VGI-specific actions. As noted in the VGI staff paper (Appendix B), these recommendations could generally be addressed (at least in part) in the context of a final decision on the TEF. Therefore, while these recommendations could increase VGI by increasing the pool of available resources, these issues are best deferred for future consideration in any future decision(s) on the TEF.

6. Near-Term Policy Actions

While the VGI strategies discussed above and adopted by this decision constitute important guidance for stakeholders and the large electrical corporations, party comments on the SB 676 ruling and in the VGI WG report identified a number of near-term policy actions that enjoyed broad stakeholder support and should be pursued as soon as possible to advance the VGI strategies.[52] Each of these near-term policy actions will support at least one of the

[52] VGI WG Final Report at 10.

categories of VGI strategies adopted to comply with SB 676. The VGI WG has in many cases also identified specific use cases that these near-term policy actions will support.

Several parties including Joint Commenters, SBUA, UCAN, and UCS proposed the adoption of near-term action plans for VGI. For example, Joint Commenters and Fermata proposed that the Commission adopt a "Model VGI Portfolio" and direct the large electrical corporations to develop their own VGI portfolios and begin implementation in 2021.[53]

UCS proposed that the large electrical corporations and other LSEs should begin to act on VGI strategies in the 2021 timeframe.[54]

The Commission agrees that the record demonstrates that the time is ripe to pursue these near-term objectives and adopts several such objectives below.

6.1. Avoiding Electrical Infrastructure Upgrades

As noted in the VGI WG report and VGI staff paper,[55] VGI can reduce congestion on existing power distribution infrastructure and reduce ratepayer costs by avoiding costly distribution system upgrades. Automated or Active Load Management (ALM) is software-based technology to manage EV charging load, also known as EV Energy Management Systems[56] or load management. Some parties proposed adopting ALM as a VGI policy action. This action would advance the "Develop and Fund Government and Load-Serving Entity Customer Programs, Incentives, and Distributed Energy Resource Procurements" category described in section 5.2 above.

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[53] Joint Commenters opening comments at 4; Fermata reply comments at 3.

[54] UCS comments at 4.

[55] VGI staff paper at 3.

[56] This term is used interchangeably with ALM.

Because ALM has the potential to vary the charging of grid-connected EVs in a way that optimizes grid performance, this decision adopts the following near-term VGI policy actions.

6.1.1. Use of ALM in Large Electrical Corporations' TE Programs, Rules, and Tariffs

Joint Commenters propose that the Commission adopt an ALM tariff or incentive that would enable utility customers to use ALM to reduce local demand and corresponding distribution upgrade costs (including "make ready" investments as noted earlier). Customers could either be incentivized to use ALM by way of a rebate or rate discount, which may be a "revenue neutral" approach compared to a non-ALM approach that requires distribution upgrades.[57] In addition, the VGI Work Group stakeholder recommendations broadly support the use of ALM to avoid utility-side upgrades (VGI Work Group recommendations 2.04 and 2.17). No party expressly objected to adoption of an ALM strategy for VGI.

In addition, PG&E has demonstrated, in an existing TE light duty program, that deployment of ALM products will reduce costs at suitable host sites.[58] Once installed, the technology typically provides the capacity to support other potential VGI strategies as well (such as, for example, demand charge management).

Therefore, the large electrical corporations shall identify in all future applications for TE programs how they will deploy customer-side ALM at host

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[57] Joint Commenters opening comments at 8-9.

[58] PG&E provided this information in a document titled "Pacific Gas and Electric Company Electric Vehicle Infrastructure OIR Rulemaking 18-12-006 Data Response" dated October 13, 2020 (Appendix D to this decision). PG&E also noted that in some cases the technology will allow installation of TE infrastructure in areas that lack space for physical infrastructure upgrades.

sites where this technology will support TE installation at equal or lesser costs than hardware-based electrical capacity.[59] In addition, any future tariff or rule filed by a large electrical corporation for service line and/or distribution line upgrades to support transportation electrification shall provide an option for customer-side ALM where beneficial to ratepayers. The large electrical corporations shall develop standard evaluation criteria to determine host sites where ALM would benefit ratepayers by reducing costs while meeting host site needs for EV charging. They shall describe this process in their applications for TE programs, rules, or tariffs. Furthermore, they shall provide customer education and evaluate customer acceptance once ALM systems are installed. In addition, they shall identify any complementary policies needed to support this technology during annual reporting.[60]

Consideration of this technology may also benefit existing TE programs where a significant number of projects have not yet reached the design phase. For instance, D.20-08-045 issued September 2, 2020 approved SCE's ChargeReady 2 program. SCE shall submit a Tier 2 advice letter within 90 days of this decision with a study of the potential for deployment of this technology and recommendations regarding deployment in the ChargeReady 2 program.

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[59] This decision does not address whether investing ratepayer funding to achieve other VGI services is cost-effective or desirable.

[60] For instance, some party comments (Joint Commenters' opening comments on the SB 676 ruling at 8 reference Nuuve Corporation and Enel X North American reply comments on the draft TEF section 8 at 8) raised concerns that Rule 2 adopted by the large electrical corporations may be written or implemented in a way that restricts some of the potential benefits of ALM. These parties are concerned that the large electrical corporations will calculate load from connected equipment based on the nameplate capacity of each EVSE rather than the capacity of the facility as a whole, creating a barrier to using ALM to avoid upgrades to utility-side infrastructure.

SCE may file a stand-alone advice letter or address this requirement within any other appropriate advice letter filing required by D.20-08-045.

As noted by CALSTART, deployment of VGI for medium and heavy-duty charging offers a large opportunity to avoid distribution upgrades and investor-owned utility (IOU) TE program "make-ready" costs.[61] Therefore, the large electrical corporations shall identify in annual VGI reporting deployment the number of ALM technologies installed for any medium and heavy-duty vehicle segment(s) under currently approved TE programs as well as the expected avoided distribution and customer-side cost savings.

The large electrical corporations shall report on ALM deployment (in both existing and any future TE programs) in their annual VGI reporting required by this decision. These reporting requirements are discussed in more detail in section 15.1 of this decision.

6.1.2 Additional Potential Opportunities for Distribution Upgrade Deferrals

ALM and/or other VGI technologies could potentially also support the distribution grid by reducing demand from a host site and/or exporting power to the grid (as discussed further in the subsequent subsection) at times of peak demand to offset other distribution system load. The large electrical corporations should consider opportunities to advance distribution deferral in any pilots or other policy actions under this decision. In addition, integrating VGI across all relevant business activities (see section 6.6) is particularly relevant for avoiding distribution upgrades as noted in the draft TEF (at 23) including any future solicitations for distribution deferral projects. A future decision, such as any

[61] CALSTART Opening Comments on the Draft Transportation Electrification Framework Section 11 – Vehicle Grid Integrate and the Vehicle Grid Integration Working Group Report 4.

future decision on the draft TEF, may further consider opportunities to avoid distribution system upgrades.

6.2. Credit-for-Export

Joint Commenters suggested creating a tariff or form of compensation for EVs that export electricity to the grid in times of need, or potentially expanding eligibility under the net energy metering (NEM) program for credited exports.[62] The NEM program credits customers who export power produced by on-site renewable generation onto the grid. By directly incenting the export of energy from an EV to the grid, this strategy would provide incentives for the deployment of technologies and programs that would allow EV drivers to sell their stored electricity to grid operators in times of need. It is therefore reasonable to adopt consideration of this kind of compensation as a near-term policy action to advance the VGI strategy category "Reform Retail Rates" as noted above in Section 5.2 and/or "Develop and Fund Government and Load-Serving Entity Customer Programs, Incentives, and Distributed Energy Resource Procurements" as noted above in Section 5.3.

Several VGI WG recommendations (1.09, 1.16, 6.04) indicate that export of power from EV batteries connected to renewable facilities may not be eligible, or that eligibility may be unclear, for current utility net energy metering successor tariffs, informally known as NEM 2.0 tariffs.[63] Parties may address eligibility issues within the current NEM proceeding, R.20-08-020, although this decision

[62] Joint Commenters opening comments at 9 ("[t]his would provide a bill credit to EV customers who are able to export to the grid during peak times. The credit would be linked to the on-peak retail rate and would be analogous to the Commission's existing policy for net energy metering").

[63] *See* VGI staff report at 13, 15 and 24.

does not prejudice the determination under R.20-08-020 regarding whether the issue should be included within its scope.

In addition, parties have advocated for a Commission program that would compensate EV drivers for electricity exports more broadly, including exports from EVs charged from the grid. Exploring the concept of credit-for-export from EVs that are grid-connected would further VGI strategies noted earlier. It would be useful for such consideration to occur in a Commission proceeding that also considers credit for exports from other types of energy storage systems.[64]

To avoid any ambiguity, this decision expressly declines to find that the creation of any credit-for-export scheme is reasonable, but rather that the exploration of such a scheme should be pursued.

6.3. Demand Response

Several parties recommended considering EV participation in demand response as a near-term VGI policy action. Joint Commenters proposed that EV charging load's demand responsiveness could be a "source of local or system capacity (e.g. as demand response resources)" through either a tariff-based mechanism or by allowing EVs to bid into resource adequacy markets.[65] UCS also promoted the ability of EVs to provide demand response through retail rate design and other measures.[66]

The concept of utilizing EVs to provide demand response comports with the definition of VGI adopted by this decision as it would allow EVs to provide grid services during times of critical strain on the grid. The ability of EVs to

[64] *See* PG&E reply comments at 2-3.

[65] Joint Commenters opening comments at 13.

[66] UCS opening comments at 10.

supply demand response is a VGI policy action supported by parties[67] and is adopted by this decision to further the category of VGI strategies "Develop and Fund Government and Load-Serving Entity Customer Programs, Incentives, and Distributed Energy Resource Procurements" in section 5.2.

The Commission has already established at least one venue for potential deployment of VGI to provide demand response. D.17-12-003 requires the large electrical corporations to submit a third-party aggregator supply-based demand response program by the fourth quarter of 2021 to cover the period of 2023-2027. However, incorporating VGI strategies into any existing program may require education for potential market participants and consideration of whether the program design could accommodate VGI strategies if they meet the program objectives.

To ensure that large electrical corporations and potential VGI market actors understand program requirements and the potential for VGI to provide demand response services, the large electrical corporations shall jointly host a workshop in the first quarter of 2021 to educate potential VGI demand response providers on demand response opportunities and identify any barriers to participation for VGI resources. The large electrical corporations shall develop the agenda in collaboration with the Commission's Energy Division staff and shall serve notice of the workshop's date, time, and location not less than 10 days in advance to the service list of this proceeding and the service list for Application 17-01-012. The IOUs shall serve to the service list of this proceeding and the service list for Application 17-01-012 a post-workshop report within 30 days of the workshop that identifies any barriers to VGI participation in this

[67] *See, e.g.,* Joint Commenters opening comments at 10; PG&E opening comments at 3.

demand response program, or any other programs such as bids for resource adequacy services to be delivered in 2022 under D.19-07-009.

The large electrical corporations shall report on VGI participation in their demand response programs in their annual VGI reporting required by this decision. These reporting requirements are discussed in more detail in section 15 of this decision.

6.4. Emerging Technology

Energy Division staff proposed that the large electrical corporations implement an emerging technology program for Transportation Electrification in section 8.5 of the draft TEF. The staff proposal in the draft TEF[68] would authorize laboratory testing, development of testing standards, paper studies and small-scale field trials (not full demonstration). These activities would help facilitate the development of pre-commercial technologies and/or evaluate their potential for future application in IOU programs.

Two of the electrical corporations as well as Cal Advocates and the VGI Council (VGIC) agreed with this proposal in their comments on sections 7 and 8 of the draft TEF.[69] Cal Advocates and SCE noted that the program will fill gaps in existing programs around market development, evaluating consumer acceptance, and communication between IOUs and potential program providers (they also provided additional details regarding potential scope). EDF stated in opening comments that existing efforts are sufficient without the need for a new program. SCE disagreed in reply comments and stated that the program will fill

[68] Draft TEF at 94.

[69] Opening comments from Public Advocates Office (CalAdvocates) at 6, SCE at 13, VGIC at 20 and reply comments from SCE at 2 and SDG&E at 9.

a gap in EPIC and other programs.[70] SCE reply comments also recommended disseminating results from the program via the Emerging Technology Coordinating Council.[71]

In addition, VGI WG recommendation 7.13 supports the creation of an emerging technology program.[72] The VGI staff paper (Appendix B) suggested that parties comment on an appropriate budget level. No party proposed a specific budget.

The Commission finds that an emerging technology program is a necessary policy action to support the VGI strategy category "Pilots, Demonstrations, Emerging Technology, and Studies" described in section 5.5. The IOUs shall jointly file a Tier 3 implementation advice letter within 150 days of this decision requesting approval of a proposed scope and budget for a VGI/TE Emerging Technology program as described further below. The IOUs must consult with the California Energy Commission and other state agencies; other LSEs conducting technology development activities; and other experts and stakeholders including Program Advisory Councils to help develop the proposed program structure and scope. The advice letter shall also contain a proposed process to annually refine the program scope in consultation with these same entities.

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[70] EDF opening comments at 12 and SCE reply comments at 3.

[71] SCE noted that the Emerging Technology Coordinating Council is used by the Energy Efficiency Emerging Technology and Demand Response Emerging Markets and Technology programs to share interim progress, reports, and lessons learned on tests and demonstrations.

[72] https://airtable.com/shr9JBvC2bAofuJpj/tblnhdgV5jGZjCmhh/viwoJnPy7PknfuvPQ

The electrical corporations shall consider the following topics, if not already addressed through other activities, when developing the program scope and may also include others:

- Providing research on customer needs and specifications that might help new products reach the market and testing facilities for potential new products.
- Providing opportunities to test emerging technologies and provide consultation for new TE technologies in the development stage (including providing information about market readiness and IOU program standards and requirements) and communication between utilities and providers.
- Filling gaps in data for VGI costs and benefits and thus market viability.

In the advice letter requesting approval of a VGI Emerging Technology Program, the large electrical corporations shall propose and provide justification for a reasonable budget that reflects priority unfunded needs. This budget should also reflect opportunities to leverage and not duplicate technology development funding from existing Energy Commission (*see* Appendix C) and other programs. As the program may be similar in function to the Demand Response Emerging Technology program, authorized by D.17-12-003 with a $5.2 million budget, the proposed program budget should not exceed $5 million annually combined for all of the large electrical corporations for an initial period of two years. Large electrical corporations may include a request to extend the program in TEPs and applications filed pursuant to their TEPs. If it becomes necessary to bridge between the initial two-year program period and Commission decisions on future IOU applications, IOUs may file up to two Tier 2 advice letters with requests for a one-year extension.

The large electrical corporations shall report semi-annually to the Commission on program status, results to date, budget, challenges, and lessons learned. The first program report will be due eight months after program approval. The large electrical corporations may propose to combine this reporting with other types of reporting after obtaining agreement from the Commission's Energy Division. IOUs shall also disseminate research and program reports and other results via the Emerging Technologies Coordinating Council and potentially other avenues.

6.5. Integration of VGI Across All Relevant Business Activities

The VGI WG found in its final report that a wide-ranging effort is needed to integrate VGI in utility business activities and provided over 60 recommendations related to utilities or Commission regulation of utilities. In addition, the VGI section of the draft TEF (at 138) recommends integrating VGI across all business activities. This decision therefore adopts as a VGI policy action that the large electrical corporations identify how they integrate VGI across their relevant business activities, including but not limited to distribution upgrade deferrals as noted earlier. This policy action could potentially support any or all of the VGI strategy categories described in section 5.

The large electrical corporations shall include this information in their annual VGI reporting required by this decision. These reporting requirements are discussed in more detail in section 15 of this decision.

6.6. Site Load Management

Parties commented[73] that IOUs should establish load management templates for participants in IOU programs. The template would list different strategies and steps such as curtailing charging during critical peak pricing periods and educating the site host on how load management could reduce their electric bill. This decision adopts a site load management policy action to support the VGI strategy category "Develop and Fund Government and Load-Serving Entity Customer Programs, Incentives, and Distributed Energy Resource Procurements" as described in section 5.3.

D.20-08-045 (at 93 and 148) has established specific requirements for SCE's Charge Ready 2 Infrastructure and Market Education Programs that provide a precedent for how these requirements should be applied to all future customer-facing TE programs.

First, all future IOU TE applications shall contain strategies for educating host sites on the benefits of passing TOU rate-signals to drivers and participating in any demand response program(s) for which they are eligible. Reporting will be addressed in any future decisions regarding such programs. In addition, IOUs shall establish outreach materials and load management tactics to reduce any grid impacts from sites that opt out of the default agreement to pass on TOU pricing. IOUs shall report on the tactics used and the number of sites (by location type) that opt out of passing through TOU signals. In addition, IOUs should annually report on the peak load of sites that have elected to opt out of the default TOU pricing arrangement.

[73] Cal Advocates opening comments at 4, UCAN reply comments at 8, UCS reply comments at 2.

The Commission recognizes the importance of providing more general education to host sites and intends to provide any necessary guidance via a future decision on the ME&O section of the draft TEF.

6.7. Enabling "Vehicle to Load" Options in TE Programs

Fermata stated that VGI solutions provide back-up power to buildings and other on-site load at lesser incremental costs than systems based on separate storage batteries.[74] A number of companies offer this capability now, and others have announced plans to enter the market. Fermata also stated that some TE electrical infrastructure design choices prevent the use of VGI for on-site back up power for buildings or other load and should be avoided in the large electrical corporation's TE programs.[75]

This decision adopts a policy action to enable "vehicle to load" options in TE programs (other future decisions may further address VGI and resiliency). This policy action will support VGI strategy category "Accelerate Use of EVs for Bi-Directional Non-Grid-Export Power and PSPS Resiliency and Backup" (*see* section 5). The large electrical corporations shall address in all future TE program applications how TE programs will maximize the potential use of VGI for on-site backup power.

6.8. Pilots

As noted in section 5, many parties support pilots that advance VGI commercialization and this decision finds that pilots are a policy action to

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[74] Fermata reply comments at 9.

[75] Fermata reply comments at 7. Fermata noted that installing a separate electrical service for EV charging will prevent EVs from providing back-up power to a building or other load and provide back-up power because the EVSE charging is physically separated from the electrical system for the building (or other load).

support the VGI strategy category "Pilots, Demonstrations, Emerging Technology, and Studies" as described in section 5.5.

The forthcoming pilots should address practical barriers to VGI-enabling technologies that have already been demonstrated and develop pathways to scale implementation through existing or potential new IOU programs that would further the goals of SB 676.

The large electrical corporations shall begin the planning process by jointly completing a stocktake[76] to determine existing or planned pilots related to VGI funded by themselves, other LSEs, the Energy Commission, or any other organization. They shall provide a draft stocktake to ED staff for review within 30 days of this decision and then provide this stocktake to the DRIVE OIR service list within 60 days of this decision. The large electrical corporations shall also jointly conduct a public workshop on the purpose and budgets of proposed pilots within 90 days of the effective date of this decision and provide notice to, at a minimum, the service list for this decision and R.19-10-005.

Prior to this workshop, the large electrical corporations shall collaborate with staff from the Commission's Energy Division, the Energy Commission, other California LSEs and other stakeholders as needed to 1) develop a list of priority needs for pilots, 2) ensure that the list avoids overlap with scope of the EPIC program or other programs including those administered by the Energy Commission (*see* Appendix C), and 3) ensure that the pilots will not delay the implementation of strategies at scale that do not require piloting.

[76] The word "stocktake" as used by this decision means a review of existing or planned programs in a given TE area, in this case VGI pilots. This review would allow Commission staff and stakeholders to understand the current breadth of TE programs such that new programs can be planned to maximize administrative efficiency.

The large electrical corporations may file Tier 3 advice letters requesting approval of VGI pilots within 210 days of this decision.[77] Each advice letter for a VGI pilot must contain an evaluation plan that identifies a process to determine the success of each pilot and the feasibility and desirability of scaling the pilot to a full-scale program or utilize the results to revise an existing program.

At a minimum, the large electrical corporations must consider the following when choosing pilot proposals:

- Pilots listed in the final report of the VGI WG as "near term priorities with strongest agreement",[78] many of which were also identified in party comments;
- Both passenger vehicle and medium and heavy-duty vehicle opportunities including medium and heavy-duty recommendations by CALSTART; and[79]
- Pilots that include model-based simulation to provide a broader understanding of expected operations, including potential to provide VGI-services, and strategies to optimize between potential VGI services while still meeting transportation-related needs.

The Vehicle Grid Integration WG provided a recommendation for $50 million in total funding for a variety of pilots and demonstrations from ratepayers and other sources including EPIC. Thus, a lesser amount is needed specifically for pilots. For instance, EPIC has historically funded VGI-specific projects and projects that contribute to VGI goals over the prior two EPIC

[77] A future decision on the draft TEF may provide direction on how to include additional future potential pilots in TEPs and applications filed under TEPs.

[78] VGI WG Final Report at 31.

[79] CALSTART Opening Comments on the Draft Transportation Electrification Framework Section 11 – Vehicle Grid Integration and the Vehicle Grid Integration Working Group Report August 21, 2020 at 6.

cycles.[80] Therefore, the large electrical corporations shall identify any non-ratepayer potential funding sources and shall not request, in their combined applications, more than $35 million for VGI pilots authorized by this decision. Each large electrical corporation shall be limited to their pro-rata share, based on combined electrical and distribution annual load in kilowatt-hours (kWh), unless the electrical corporations jointly request an alternative means of apportioning this combined budget. ED staff should reduce proposed budgets if other funding sources are identified and/or a lower total funding need is identified.

6.9. Identification of VGI Use Cases

The VGI WG Final Report[81] identified a large number of use cases. While the WG provided a significant amount of information about these use cases, this information is far from complete. Therefore, this decision adopts as a near-term VGI policy action a requirement that the large electrical corporations identify the use cases or categories of use cases addressed by each VGI policy action identified in this decision while filing any applications or advice letters. This data will support the VGI strategy category "Pilots, Demonstrations, Emerging Technology, and Studies" described in section 5.5 by linking new data generated by VGI strategies to relevant use cases.

7. Equity Considerations

Several parties pointed to the need to ensure that the benefits of VGI and SB 676-related strategies were equitably distributed among communities in California. SBUA argued that disadvantaged communities and hard-to-reach customers, including small businesses, should receive higher subsidies in the

[80] Some projects address multiple topics and the TE share cannot necessarily be determined exactly.

[81] VGI WG Final Report at 28.

VGI context than middle and upper income drivers because incentives targeting these groups are more likely to result in behavior change than for middle and upper income customers.[82]

UCS recommended that VGI demonstration projects should serve environmental and social justice communities, where appropriate, to bring benefits and build capacity in those areas.[83]

Joint Commenters supported UCS's comment that environmental and social justice (ESJ) communities, in particular, need thorough ME&O on VGI opportunities to ensure they are aware of and have access to the benefits of VGI; and UCS's recommendation that the Commission facilitate utility coordination with other agencies to provide VGI educational materials to low-income drivers under existing Energy Commission and California Air Resources Board programs.

In light of the party interest in this issue and the need to support the Commission's Environmental and Social Justice Action Plan (ESJ Action Plan),[84] it is reasonable for this decision to adopt certain equity requirements that should be included in the adopted VGI strategies and metrics. The Commission's ESJ Action Plan contains a number of relevant goals including but not limited to: increasing investment in clean energy resources to benefit ESJ communities; improving local air quality and public health; enhancing meaningful outreach and public participations opportunities for ESJ communities; increasing climate resiliency; and promoting economic and workforce development opportunities.[85]

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[82] SBUA opening comments at 15.

[83] UCS opening comments at 12.

[84] Adopted February 21, 2019.

[85] Commission's ESJ Action Plan at 6, 7.

First, the large electrical corporations shall develop and implement strategies to prioritize ESJ communities in siting and benefits of SB 676 pilots including working with community-based organizations (CBOs) as described in the VGI staff paper. The large electrical corporations shall also include equity strategies as a topic in the SB 676 pilots workshop ordered by this decision.

Any VGI programs proposed by the large electrical corporations in future TE applications and all VGI pilots proposed via advice letters must consider the Commission's ESJ Action Plan, and any future TEF equity guidance once available; as well as the guidance issued in the VGI staff paper with respect to equity.

Any VGI programs proposed by the large electrical corporations in their future TE applications that include proposals for rebates to encourage VGI implementation shall include increased incentive levels for ESJ communities. The large electrical corporations must also document in their applications effective strategies for engagement with CBOs to seek their advice on program design and implementation such that ESJ communities are appropriately prioritized.

The large electrical corporations should also cooperate with other agencies to evaluate the potential to leverage EVs deployed by state and local equity programs as a VGI resource. Furthermore, the large electrical corporations should recognize that customer engagement in DACs and low-income communities is an essential component of implementing ME&O strategies for VGI programs.

8. Do the VGI Strategies Adopted Pursuant to SB 676 Account for the Effect of Time-of-Use Rates on Electricity Demand from Electric Vehicle Charging?

One of the statutory conditions for any VGI strategy adopted by the Commission pursuant to SB 676 is that it accounts for the effect of TOU rates on electricity demand from EV charging.

The VGI strategies adopted by this decision pursuant to SB 676 include reform of retail rates and interconnection reform. Reform of retail rates expressly accounts for the effect of TOU rates as the intent of the strategy is to reform TOU rates to advance VGI. In addition, other VGI strategies adopted in this decision that are intended to further the development and deployment of VGI technologies and use cases generally will also increase the potential for customers to respond to TOU rates.

9. Are the VGI Strategies Adopted Pursuant to SB 676 in the Best Interests of Ratepayers, as Defined in Section 740.8, and Consistent with Section 451?

One of the statutory conditions for any VGI strategy adopted by the Commission in accordance with SB 676 is that it be in the best interests of ratepayers as defined by Section 740.8 and consistent with Section 451.[86]

Section 740.8 states that the "interests" of ratepayers mean direct benefits that are specific to ratepayers, consistent with both of the following: a) safer, more reliable, or less costly gas or electrical service, consistent with Section 451, including electrical service that is safer, more reliable, or less costly due to either improved use of the electric system or improved integration of renewable energy generation; and b) any one of the following: 1) improvement in energy efficiency of travel, 2) reduction of health and environmental impacts from air pollution,

[86] Section 740.16(c)(2).

3) reduction of greenhouse gas emissions related to electricity and natural gas production and use, 4) increased use of alternative fuels, or 5) creating high-quality jobs or other economic benefits, including in disadvantaged communities identified pursuant to Section 39711 of the Health and Safety Code.

Section 451 generally holds that rates and utility charges shall be just and reasonable.

There are three VGI strategies adopted by this decision pursuant to SB 676: reformation of retail rates, interconnection reform, and other technical standards. Each of these strategies is in the best interests of ratepayers as defined by Section 740.8 because they seek to make electrical service more reliable by allowing EVs to manage their use of the grid and potentially direct energy to the grid in times of need. Furthermore, the promotion of VGI in general is intended to promote EV ownership, which will reduce the health and environmental impacts of air pollution and increase the use of alternative fuels (*i.e.*, electricity). Because no particular rate or charge is being approved by this decision, there also is no inconsistency with Section 451.

10. Do the VGI Strategies Adopted Pursuant to SB 676 Reflect Electrical Demand Attributable to EV Charging, Including from Existing Approved Rates and Programs?

One of the statutory conditions for any VGI strategy adopted by the Commission in accordance with SB 676 is that it reflect electrical demand attributable to EV charging, including from existing approved rates and programs.[87] Each of the three VGI strategies adopted under SB 676 reflects electrical demand attributable to EV charging.

[87] Section 740.16(c)(3).

Reform of retail rates considers the electrical demand attributable to EVs by seeking to modify the pattern of that demand by using TOU rates. Interconnection reform and other technical standards also consider the electrical demand attributable to EV charging by seeking to advance the interconnection of VGI to the grid and the provision of grid services by EVs that, by definition, utilize the demand attributable to EVs.

For the sake of clarity, and as defined previously in the decision, this decision holds that any use of VGI is intended to manage electrical demand from EVs in a way that provides grid benefits.

11. Consistency with the Transportation Electrification Goals Described in Section 740.12

One of the statutory conditions for any VGI strategy adopted by the Commission in accordance with SB 676 is consistency with the transportation electrification goals established by the Legislature in Section 740.12, namely the promotion of transportation electrification.[88]

Each of the three SB 676 strategies promotes EV ownership and transportation electrification by advancing the ability of EVs to provide grid benefits, and thereby potentially providing financial and/or other benefits to EV operators. Therefore, each of these three strategies are consistent with the transportation electrification goals established by the Legislature in Section 740.12.

12. Adoption and Promotion of Strategies are not Dependent on SB 676

As described above, the Commission currently lacks information about whether several of the VGI strategies adopted by this decision would specifically

[88] Section 740.16(c)(4).

meet some of the criteria established by SB 676. This does not affect the duty placed on the large electrical corporations to promote the strategies, as ordered by the decision. All of the adopted VGI strategies are valuable and applicable.

13. Some VGI Issues Will be Addressed More Broadly as the Commission Considers the Draft TEF

The VGI WG provided many additional recommendations related to recommendations in the draft TEF to supporting TE broadly. These recommendations should be deferred for consideration as part of any future decisions on topics such as: EV supply equipment (EVSE) communications standards (draft TEF section 8.1); local partnerships (draft TEF sections 10.2 and 10.3); ME&O (draft TEF section 11.2); and Community Choice Aggregator (CCA) roles and relationships with IOUs, aside from the collaboration role described below in section 17 (draft TEF section 10.4).

14. Cost-Effectiveness

VGI strategies adopted by this decision pursuant to SB 676 must be shown to be cost-effective. While Joint Commenters argued that cost-effectiveness need not be strictly considered, and only evaluated during the implementation of VGI strategies,[89] this approach does not comply with the language of SB 676. The drafters of SB 676 clearly intended that the Commission conduct this evaluation *ex ante* and at the time the Commission adopts VGI strategies pursuant to SB 676. The relevant language states that the Commission shall "[e]stablish strategies and quantifiable metrics to maximize the use of feasible and cost-effective electric vehicle grid integration."[90] The verb "establish" refers to the act taken by this decision to establish VGI strategies pursuant to SB 676. The strategies adopted

[89] Joint Commenters opening comments at 15-16; SCE opening comments at 3-4.

[90] Section 740.16(c).

by this decision pursuant to SB 676 must therefore maximize the use of "cost-effective" VGI, meaning that reasonable, supporting information must be available when strategies are established to show that they will lead to cost-effective VGI. The Commission therefore rejects Joint Commenter's argument that a cost-effectiveness evaluation may be delayed until some years in the future.

Because of the need to show *ex ante* that VGI strategies adopted by this decision pursuant to SB 676 must be cost-effective, this decision only adopts three VGI strategies pursuant to SB 676. All other VGI strategies adopted by this decision are not adopted pursuant to SB 676 and are instead adopted pursuant to the Commission's authority to advance VGI generally under the terms of this rulemaking and SB 350. They are intended to support the development of technology and/or business models that can further the goals of SB 676; and provide additional information such as costs and benefits that could show cost-effectiveness in the future.

15. Metrics

One of the statutory conditions for any VGI strategy adopted by the Commission in accordance with SB 676 is that the Commission also adopt "quantifiable metrics" that can be used to determine whether the implementation of the strategy is effective.[91]

The VGI staff paper proposed establishing activity, program, and outcome metrics based on informal VGI WG discussions. Activity metrics would track

[91] Section 740.16(c). Arguably this subsection could also be interpreted to mean that the Commission should adopt metrics to quantify the advancement of VGI generally, but this decision choses to interpret the requirement for quantifiable metrics to relate to VGI strategies adopted pursuant to SB 676. This is consistent with the subsection's focus on Commission adoption of specific VGI strategies that meet a specific set of criteria.

adoption of VGI policy actions; program metrics would track the success of program implementation against program goals; and outcome metrics would track aggregate progress towards end goals (i.e. load shift, GHG reductions, etc.) across all programs and activities. The VGI staff paper listed examples to illustrate the categories. No party filed comments explicitly opposing the metric framework proposed by the VGI staff paper. SDG&E did argue that some existing metrics were sufficient. UCS proposed some potential revisions to illustrative examples listed in VGI staff paper.

15.1. Activity Metrics

This decision imposes numerous action items and reporting requirements on the large electrical corporations to advance VGI in California. In order to consolidate these requirements, this decision adopts as an activity metric for VGI strategies generally the reporting obligations on each of the large electrical corporations already established by this decision.

Each of the large electrical corporations shall report on the status of each activity ordered by this decision, based on a template discussed below under reporting. The template will include costs and adoption status of any VGI pilots, technology demonstrations, emerging technology programs, or implementation of strategies to reduce utility-side or customer-side electrical capacity upgrades as well as other policy actions ordered by this decision.

The large electrical corporations shall also provide an annual stocktake on actions outside of this decision that will facilitate VGI strategies.[92] The VGI staff

[92] PG&E (opening comments at 2,3) states that VGI issues also arise and could get addressed in numerous existing Commission proceedings, decisions, and tariffs. These actions fall outside of the DRIVE OIR. They include Rule 21 interconnection standards; energy storage RFOs and multi-use criteria; demand response programs under Rule 24; integrated resource plans under SB 350; the Self-Generation Incentive Program; distributed energy resources distribution

paper (Appendix B) identifies that the stocktake should address actions under the jurisdiction of the Commission as well as actions by other agencies and organizations that would help realize VGI strategies.

15.2. Program Metrics

Parties recommended a variety of program metrics to use in evaluating the adopted VGI strategies. SCE, PG&E, UCS, and Tesla each recommended evaluating how many eligible customers are participating in VGI programs and services. [93]

UCS further commented on metrics for avoided distribution upgrades, or avoided greenhouse gas emissions avoided.[94] UCS also suggested that there was a need to sub-categorize metrics for VGI related to medium-duty and heavy-duty EVs.[95] Finally, UCS believed that it would be useful to track the number and breadth of VGI pilots.[96]

Joint Commenters recommended examining the total number of participants in various VGI portfolio components, broken down by EV customers

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deferral projects under the Commission's Distribution Resources Plan proceedings; and EV and non-EV rate design reform proceedings, including time-variant and dynamic rate design proposals that price electricity used by EV customers as well as other customers. The VGI staff paper at Appendix B identifies additional potential VGI strategies such as credit for export and access to wholesale markets.

While this decision does not require that the large electrical corporations implement these strategies, it requires reporting on implementation of these actions because they are related to the VGI strategies established in this decision.

[93] SCE opening comments at 4, PG&E opening comments at 5, UCS opening comments at 13, Tesla reply comments at 4 and 5.

[94] UCS opening comments at 13.

[95] UCS reply comments at 4.

[96] UCS opening comments at 13.

and EVSE providers, as well as the number of light-duty and medium-duty/heavy-duty EVs served by each participant.[97]

SCE and PG&E suggested examining the load shift attributable to each VGI program, cost to execute the VGI programs, actual benefits derived by the VGI programs and comparison to benefits provided by DERs.[98]

With respect to VGI ME&O, PG&E recommended examining the quantity of customers engaged through ME&O conducted by each LSE, and the effectiveness of market outreach initiatives. UCS suggested disaggregated reporting on ME&O to reflect the kind of educational activities conducted.

UCS argued that the Commission should adopt sub-metrics specific to ESJ concerns, and that the large electrical corporations and other LSEs should report on VGI progress in ESJ communities.

Based on the staff proposals on this issue and the party responses, it is reasonable to adopt certain metrics to measure the progress toward achievement of certain VGI strategies. Note that the Commission is only obligated to adopt metrics for the VGI strategies adopted pursuant to SB 676 (reform of retail rates, interconnection reform, and other technical standards), and program metrics for these strategies are described below. However, this decision also adopts metrics for certain other VGI strategies to provide a holistic view of progress towards SB 676 goals

Due to the need to tailor metrics for particular programs, this decision orders the large electrical corporations to develop the following metrics in

[97] Joint Commenters opening comments at 16.

[98] SCE opening comments at 4, PG&E opening comments at 5.

consultation with the Commission's Energy Division staff on a program-by-program basis:

- Program metrics to gauge VGI participation in demand response programs. These metrics should include the number of EV drivers enrolled in demand response, and the total capacity and quantity of energy delivered for each demand response program that enrolls EV customers. The method used to collect data should also be considered, and data collected through methods that could lead to different results should be disaggregated. The large electrical corporations shall identify any data that cannot be reported for third-party demand response programs and provide a justification.
- Program metrics for ALM deployment that include the number of sites and ports served by passenger vehicles and each medium and heavy-duty vehicle segment type and estimated distribution and customer-side cost savings. These metrics shall also include any challenges to deployment of this technology and actions taken to overcome these challenges.
- Program metrics for pilots and technology demonstrations that assess the implementation status of each approved pilot, lessons learned, a brief narrative description, and a cross-reference to a more detailed report where available.
- Program metrics for emerging technologies including fiscal metrics such as budget allocated, committed, and expended. The utilities shall also disseminate these results via the Emerging Technologies Coordinating Council.
- Program metrics for reforming retail rates which shall include continuing to collect data collection on load shifting and load profiles for the TE programs of the large electrical corporations and a disaggregation of "rate-to-host" and "rate-to-driver" customers. The metric shall also include a report on the adoption of dynamic rates, EV owner participation in static TOU and dynamic rates (to the extent the large electrical corporations can identify such customers), and resulting load-shift from participation in such rates.
- Program metrics for interconnection reform that include a report on the progress of reforming interconnection rules to facilitate and advance VGI deployment.

- Program metrics for evaluating the load management performance of various TE programs including, 1) the success rate of strategies for encouraging host sites to participate in rate-to-driver and any demand response program for which they are eligible, including feedback from host sites on barriers to participation, and 2) the peak load and total average daily load of a) sites participating in the default TOU pricing arrangement or demand response; and b) sites that have elected to opt out of the default TOU pricing arrangement and did not enroll in a demand response program.
- Program metrics: identify the status of any type(s) of credit-for-export available for VGI, and if any such strategy is adopted, number of participants and annual kWh by customer class.
- Program metrics: barriers identified and removed to allow vehicle- to-building or vehicle-to-load back-up power for participates in TE programs.

15.3. Outcome Metrics

Parties recommended a variety of outcome metrics. SCE suggested examining whether and how policy actions influenced manufacturers to increase the availability of products that can participate in VGI. Joint Commenters and SDG&E each sought measurement of the total number of utility customers with backup power options provided by EVs. SDG&E, PG&E and Joint Commenters also recommended examining load shifting in a variety of ways, including an evaluation of the percentage of megawatt-hours (MWh) consumed off-peak, total renewable generation used, and an evaluation of the megawatts (MW) of demand reduction that VGI provides relative to a non-managed charging approach.

UCS recommended assessing the marginal greenhouse gas emissions rate during VGI charging hours, similar to what is presently used to measure emissions attributable to energy storage utilization in the Self Generation Incentive Program.

With respect to the potential grid benefits provided by VGI, Joint Commenters suggested assessing the gross benefits of any grid services provided (*e.g.,* ancillary services, capacity), while SDG&E sought to focus on existing grid reliability. Joint Commenters and UCS also believed it was worth examining the total reduction in distribution system upgrade costs through VGI active load management. However, UCS noted that attribution for avoided distribution upgrades can be uncertain, particularly in the residential sector, and that this metric should be reported separately for residential and commercial sectors.

Based on party comments on staff proposals for outcome metrics related to VGI strategies, this decision finds that it is reasonable to adopt the following outcome metrics. The large electrical corporations shall begin tracking these metrics beginning with January 1, 2021 (or continue to track this data where they are already collecting it for other purposes). This data will establish a baseline for evaluation of future progress. Data collection shall continue through December 31, 2030.

- Load profile for managed EV charging as opposed to unmanaged EV charging. Managing charging may include participants in large electrical corporation TE programs or "rate-to-driver" schemes; and participants outside of TE programs on TOU rates. The large electrical corporations should disaggregate this data where strategies or different data collection methods are used if these differences could affect the results (for instance, whole-house metering will yield a different result than separately metered or sub-metered EVs and any data collected from vehicle telemetry may yield different results than data collected from a stationary meter).
- Estimated GHG reductions and, to the extent practical, estimated air pollution reductions.
- Total customers using EVs as a source of back-up power on-site, broken down by rate class.

- A running list updated at least quarterly and available on one electrical corporations website of EV charging equipment with "V2X" functionality, i.e. ability to export load from an EV to a host site or to the grid, including relevant technical capabilities and certifications.
- A running list updated at least quarterly of utility-side upgrades (both the customer service and other distribution infrastructure) avoided/mitigated for EV charging sites as a result of utilization of behind-the-meter VGI services such as ALM, and net avoided costs.

15.4. Sub-Categories for Program and Outcome Metrics

In order to more granularly analyze progress toward achieving the VGI strategies and near-term priorities outlined in this decision, the Commission finds that it is reasonable to order collection of sub-categories for each of the program and outcome metrics adopted. For each of these metrics, the large electrical corporations shall:

- Break-out residential and commercial customers.
- For residential customer VGI programs, the large electrical corporations shall propose ESJ sub-categories for reporting program and outcome metrics and consider sub-categories for commercial customers after consultation with the Commission's Energy Division staff.
- Break-out medium-duty and heavy-duty use cases from light-duty use cases, and determine whether additional segments are necessary after consultation with the Commission's Energy Division staff.
- Commercial customers may be sub-divided on a case-by-case basis for each large electrical corporation after consultation with the Commission's Energy Division staff.

For those sub-category definitions that require consultation with the Commission's Energy Division staff, the large electrical corporations shall ensure that such consultation is completed no later than 90 days after the effective date of this decision, and that the results of the consultation are reflected as soon as is practicable in VGI metric reporting.

15.5. Reporting

This decision imposes numerous action items and reporting requirements on the large electrical corporations in order to advance VGI in California. Each of the large electrical corporations shall consult with the Commission's Energy Division staff to create a reporting template for "mid-term" and annual reports. This decision establishes September 15, 2021 as the initial deadline for the first "mid-term" report required by this decision and March 15, 2022 as the deadline for the first full annual report. The final VGI report shall be filed on March 15, 2031. Future Commission decisions may propose a different reporting frequency for some data elements that is no less than annual. The large electrical corporations may eliminate certain data from their report, if it becomes irrelevant, with the concurrence of the Commission's Energy Division staff.

A future Commission decision may identify a different timeline for reporting and may consider revisions to the schedule adopted in this decision for such data.

This decision holds that, as proposed by Cal Advocates,[99] the SB 350 reporting template should be a model and the large electrical corporations shall work with the Commission's Energy Division staff to review and revise existing templates and if necessary create any additional template(s) for VGI reporting.

The large electrical corporations must develop templates for the data to be included in the "mid-term" and annual report, in consultation with the Commission's Energy Division staff, and serve a draft of the data templates on the service list of this proceeding by February 28, 2021. The large electrical corporations shall jointly hold a workshop no later than March 20, 2021 to solicit

[99] CalAdvocates opening comments on sections 6 and 11 of the draft TEF at 12.

feedback from interested parties before finalizing the templates. The large electrical corporations shall post the final data template, after receiving concurrence from the Commission's Energy Division staff, no later than April 20, 2021.

The Commission may consider revising this structure in the future, including in any decision on the draft TEF, to align with other TE reporting requirements.

16. Consideration of the National Institute of Standards and Technology's Reliability and Cybersecurity Protocols

For each of the VGI protocols adopted pursuant to SB 676, the Commission must consider whether to incorporate the National Institute of Standards and Technology's reliability and cybersecurity protocols, or other equally protective or more protective cybersecurity protocols, into the adopted VGI strategies.[100] While not totally clear how to incorporate a cybersecurity protocol "into" a number of the VGI strategies that are not related to any specific technologies or standards such as rates or opening wholesale markets to VGI, this decision holds that SB 676 requires the Commission consider whether to order the large electrical corporations to apply the National Institute of Standards and Technology's reliability and cybersecurity protocols, or other equally protective or more protective cybersecurity protocols, to any technology that is deployed in pursuit of the VGI strategies adopted pursuant to SB 676.

No party commented on this issue in response to the SB 676 ruling, though several parties provided comments acknowledging the importance of this topic in response to the cybersecurity section 8.2 of the draft TEF. SCE noted current

[100][100] Section 740.12(c)(5).

on-going efforts in collaboration with the Department of Energy and the Electric Power Institute.[101]

As a result, the Commission requires more information to determine if the specification of additional cybersecurity protocols for VGI technology is necessary, and if so, what existing protocols should be specified or whether additional protocols are needed. For that reason, this decision orders SCE to prepare a workplan for a cybersecurity gap-analysis that would consider EV charging equipment products used for TE programs, including distributed and cloud computing, networking, and communications. SCE should coordinate with federal and other organizations with expertise in this field when developing the workplan. SCE should consider IOU owned equipment and systems; and collaborate with EVSE manufacturers and EVSPs to evaluate equipment and systems connected to IOU systems including the existing standards listed by ChargePoint.[102] SCE shall prepare a public version with non-confidential information and a confidential version for review by the Commission's Energy Division. SCE shall propose its workplan and work schedule via a Tier 2 advice letter filed no later than 180 days after the effective date of this decision.

While this review of cybersecurity issues is ongoing at the Commission, it is necessary to ensure that current best practices are being followed. All future TE applications filed by the large electrical corporations shall document that the large electrical corporations follow cybersecurity best practices for all the TE equipment they fund, such as those identified in *California Energy Systems for the*

[101] SCE opening comments on sections 8 and 9 of the draft TEF at 8.

[102] ChargePoint's opening comments on sections 7 and 8 of the draft TEF at 10 and 11.

21st Century and the National Institute of Standards and Technology's (NIST) *Framework for Improving Critical Infrastructure Cybersecurity*.

17. Community Choice Aggregators

This decision addresses two topics regarding CCAs and VGI: SB 676 statutory reporting obligations and collaboration between large electrical corporations and CCAs. Some parties provided comments on other issues in response to both the draft TEF and the SB 676 ruling, including whether CCAs are eligible to apply to the Commission for TE program funding. This decision does not address these other topics, which can be considered in a future Commission decision on the TEF.

17.1. Statutory reporting

Section 740.16(g) requires that "[e]ach community choice aggregator shall, one year after the commission establishes electric vehicle grid integration strategies pursuant to subdivision (c), report annually to the commission describing how its current and planned programs, rates, and investments in transportation electrification are expected to further the electric vehicle grid integration strategies." The Commission has not previously requested comments on how reporting requirements should be implemented by CCAs.

This decision establishes specific CCA reporting requirements. These requirements differ from requirements for large electrical corporations because the statute does not require that CCAs implement the VGI strategies required of large electrical corporations.

Each CCA shall describe how its current and planned activities (i.e. programs, rates, and investments in transportation electrification) are expected to further electric vehicle grid integration strategies. At a minimum, each CCA shall report on its activities and programs using relevant section(s) of the reporting

template developed for large electrical corporation reporting. A CCA may request the creation of a template for use by CCAs with the agreement of the Commission's Energy Division staff. CCAs shall also provide outcome-based metrics related to their role providing energy (some metrics are not relevant to energy utilities), including but not limited to load profiles for EV charging and participation, CCA demand response programs, and avoided GHG. CCAs may jointly report on any output metrics or other metrics with a large electrical corporation in their service territory.

CCAs shall report by March 15, 2022 and annually through March 15, 2031.

This decision also recognizes that some CCAs have fewer resources, and therefore defers some requirement for smaller CCAs so that they can learn from the experience of other CCAs. The SB 676 legislative digest states that the bill establishes requirements for public utilities with greater than 700 gigawatt-hours (GWh) of annual electrical demand. While the legislature did not apply this distinction to CCAs, this decision finds that the same threshold is also appropriate to define smaller CCAs of equal to or less than 700 GWh of annual electrical demand that will be deferred from full reporting until March 15, 2023. During the deferral period, the annual reporting required of these CCAs by March 15, 2022 is limited to activity-based metrics for their specific VGI strategies.

17.2. Collaboration between large electrical corporations and CCAs

The final VGI WG Final Report[103] states that "coordination and planning between CCAs and IOUs on VGI will be essential." In addition, the draft TEF[104] requested party comments regarding the appropriate role of CCAs to advance VGI. In response, AEE, PG&E, and SBUA provided opening comments agreeing with the VGI WG Final Report and some mentioned specific topics such as rates and incentives. PG&E recommended that IOUs collaborate with CCAs and other LSEs.[105] No parties opposed collaboration.

Accordingly, this decision orders that each large electrical corporation host a meeting with CCAs that overlap with their service territory and interested LSEs within 60 days of this decision. Topics shall be determined by the participants and may include, but are not limited to, 1) coordination topics identified in party comments; 2) policy recommendations from the VGI Working Group that identify both investor owned utilities (i.e. large electrical corporations) and other LSEs as lead or support organizations; 3) opportunities to collaborate on mandatory SB 676 reporting by CCAs and large electrical corporations; and 4) future frequency of collaboration meetings.

17.3. Authority for CCA Orders

In order to preemptively address any concerns by the CCAs that they should not be subject to the reporting orders of this decision, we note that the Commission asserted similar authority over CCAs in D.19-09-007. In that decision the Commission considered and rejected a jurisdictional argument

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[103] VGI WG Final Report at 12.

[104] Draft TEF (at 134)

[105] PG&E opening comments on draft TEF section 11.1 at 12; AEE opening comments on draft TEF section 11.1 at 5; SBUA opening comments on draft TEF section 11.1 at 7.

concerning the authority of the Commission to order CCAs to submit to reporting requirements. That decision's rejection of the argument stated that the inability of the Commission to set CCA prices does not interfere with the Commission's duty to collect CCA price information. This decision adopts and reasserts those jurisdictional findings.

18. Role of Small and Multi-Jurisdictional Utilities

SB 676 requires that all "electrical corporations that are required to file an integrated resource plan pursuant to Section 454.52" comply with the requirements of Section 740.16.[106] PacifiCorp recommended that the Commission design any regulatory strategies or metrics with sufficient flexibility to allow utilities to tailor them to individual utilities and service areas.[107] We agree. This decision finds that providing additional flexibility for small and multi-jurisdictional utilities (SMJUs)[108] when implementing the requirements of this decision is reasonable. Specifically, SMJUs are only required to address VGI strategies in each application for transportation electrification programs and investments filed pursuant to Section 740.12 and to comply with limited reporting requirements. SMJUs shall quantify how the investments described in an application are expected to further the electric vehicle grid integration strategies adopted by the Commission in this and any subsequent decisions. This should allow these smaller utilities to learn from the experience of large electrical corporations, including pilots and deployment of VGI in TE programs, and to tailor strategies to their service territories.

[106] D. 20-03-028 at 56 requires that all load-serving entities file an Integrated Resources Plan.

[107] PacifiCorp at p2.

[108] The SMJUs are Bear Valley Electric Services, PacifiCorp, and Liberty Utilities.

In addition, the initial annual reporting of VGI metrics by each SMJU on March 15, 2022 is limited to activity-based metrics for any VGI strategies that the SMJU has adopted. After that date, they shall report annually on activity, program, and outcome metrics related to their VGI implementation strategies and policy actions. SMJUs need not participate in the large electrical corporations' annual stocktake of VGI implementation strategies and policies by other organizations as described in section **Error! Reference source not found.** of this decision. A SMJU may propose a reporting template with the agreement of the Commission's Energy Division staff.

19. Third Party Evaluation

The VGI staff paper proposed that one large electrical corporation issue a request for proposals (RFP) for third party evaluation of the large electrical corporations VGI implementation. This evaluation would complement large electrical corporation annual reports required under Section 740.16(i). The evaluation report would provide a holistic qualitative evaluation of progress to date; identify the latest best practices; and identify other lessons learned such as areas for improvement based on initial experience and/or market or technology changes. This information would inform the Commission and others of potential policy revisions or areas where additional information is needed to evaluate current policies.

The VGI staff paper proposed that one large electrical corporation would lead development of an RFP scope of work (SOW) in consultation and coordinate with the Commission's Energy Division and the other large electrical corporations and include the Commission's Energy Division in the evaluation of bidders in response to the RFP. In addition, the evaluator would provide a draft report to the Commission's Energy Division staff for review prior to release. The

final report would be due four months after the release of the IOUs' second annual report under SB 676. In the longer term, as VGI markets and technologies are better understood, evaluation would primarily occur through mid-term and annual VGI metrics reporting and could be addressed by future TEF evaluation processes if appropriate.

The VGI staff paper also requested that parties provide any comments on this topic with their comments on draft TEF section 11.1 and EDF, PG&E, SDG&E, and Tesla provided comments on this topic. Tesla agreed that identifying best practices, lessons learned and market or technology changes could be useful for future program implementation and that future evaluations could occur via the TEF and TEP updates.[109] SDG&E expressed openness to a third-party evaluator and proposed that it consider efforts by all relevant load serving entities.[110]

PG&E disagreed, saying that the evaluation would not be necessary or timely during the development of use cases and pilots.[111] EDF also disagreed and recommended that the Commission focus on integrating VGI into existing reporting requirements such as load management reports. EDF also stated that the process for hiring a Third-Party evaluator could cause delays.[112]

This decision finds that a third-party evaluation is necessary and orders that the large electrical corporations implement the VGI staff paper proposed third-party evaluation process. PG&E's assertion that the market is still evolving is correct but does not negate the need for evaluation of market development and

[109] Tesla opening comments on draft TEF sections 6 and 11 at 3 and 4.

[110] SDG&E opening comments on draft TEF sections 6 and 11 at 12.

[111] PG&E opening comments on draft TEF sections 6 and 11 at 14.

[112] EDF opening comments on draft TEF sections 6 and 11 at 11 and 12.

large electrical corporation activities. In addition, the evaluation will serve a different purpose than the load management reports cited by EDF.

Therefore, one large electrical corporation shall lead development of an RFP SOW in consultation and coordination with the Commission's Energy Division and the other large electrical corporations. The lead large electrical corporation shall share a draft SOW with the Commission's Energy Division staff by June 15, 2022 and release the RFP by July 15, 2022. The lead electrical corporation shall include the Commission's Energy Division in the evaluation of bidders in response to the RFP. The evaluator will provide a draft report to the Commission's Energy Division staff for review by June 15, 2023. The final report will be due August 15, 2023, which is four months after the release of the IOUs' second annual report under SB 676. The dates for the evaluation can be revised by the large electrical corporations in consultation with Energy Division staff if needed to allow more time to implement VGI efforts and provide enough data for the evaluation.

20. Comments on Proposed Decision

The proposed decision in this matter was mailed to the parties in accordance with Section 311 of the Public Utilities Code and comments were allowed under Rule 14.3 of the CPUC's Rules of Practice and Procedure. Comments were filed on _____, and reply comments were filed on _____ by _____.

21. Assignment of Proceeding

Clifford Rechtschaffen is the assigned Commissioner and Patrick Doherty and Sasha Goldberg are the assigned Administrative Law Judges in this proceeding.

Findings of Fact

1. VGI can provide resiliency services.

2. The reference in Section 740.16(b)(1) to "grid-connected electric vehicles" could be misconstrued in the future and read as not including some of the forms of electric transportation recently defined by D.20-09-025.

3. Reforming retail rates is feasible and low-cost with high potential benefit.

4. CAISO is the lead agency for determining wholesale electricity market rules and access, with the Commission playing a supporting role.

5. Designing wholesale market rules and access has the ability to align wholesale market signals with VGI applications (similar to the way in which retail rates can be modified to advance VGI goals).

6. Pursuit of VGI pilots, demonstrations, emerging technologies, and studies will advance VGI, as defined by this decision, by ensuring that proven VGI technologies can be scaled and by expanding the technology required to advance VGI.

7. Accelerating the use of EVs for bi-directional non-grid-export power and PSPS resiliency and backup would support broader goals around customer resiliency.

8. Reforming interconnection rules to allow for more efficient integration of EVs into the grid for the purpose of provide grid-related services is complementary to, and a condition precedent for, achieving other VGI strategies.

9. Reforming interconnection rules related to VGI services is low cost and is entirely feasible to pursue.

10. The development, approval, and supported adoption of technical standards not related to interconnection are important policy goals to advance VGI.

11. Funding and launching market education and coordination would help to advance VGI.

12. A benefit of VGI is that it allows EVs to respond to signals and provide grid services, and therefore a larger number of customers participating in VGI would be beneficial as it would increase the amount of electricity to provide grid services.

13. ALM has the potential to vary the charging of grid-connected EVs in a way that optimizes grid performance.

14. Directly incenting the export of energy from an EV to the grid would provide incentives for the development of technologies and programs that would allow EV drivers to sell their stored electricity to grid operators during times of need.

15. The concept of utilizing EVs to provide demand response would allow EVs to provide grid services during times of critical strain on the grid.

16. Each of the VGI strategies adopted pursuant to SB 676 account for the effect of TOU rates on electricity demand from EV charging.

17. Each of the VGI strategies adopted pursuant to SB 676 reflects electrical demand attributable to EV charging.

18. Each of the VGI strategies adopted pursuant to SB 676 promotes EV ownership and transportation electrification by advancing the ability of EVs to provide grid benefits, and thereby potentially providing financial benefits to EV operators.

19. The Commission requires more information to determine if the application of certain cybersecurity protocols to VGI technology is necessary, and if so what those protocols should be.

20. It is reasonable to provide small and multi-jurisdictional utilities (SMJUs) additional flexibility when implementing the requirements of this decision.

Conclusions of Law

1. Section 740.16(b)(4) grants the Commission the authority to alter the statutory definition of VGI.

2. Promotion of resiliency is an important policy objective that the Commission should seek to advance.

3. The addition of resiliency to the statutory definition of VGI is reasonable and should be approved.

4. Including the term "operational flexibility" to the language of Section 740.16(b)(1)(A) clarifies that VGI can provide this specific service to electrical grid operators in the event electrical resources are constrained.

5. Modification of the language of Section 740.16(b)(1)(A) to include the term "operational flexibility" is reasonable and should be approved.

6. To ensure consistency with D.20-09-025, the definition of VGI should be modified so that "grid-connected electric vehicles" is changed to read "grid-connected light-duty electric vehicles, medium-duty electric vehicles, heavy-duty electric vehicles, off-road electric vehicles, or off-road electric equipment."

7. Adopting the reform of retail rates as a VGI strategy pursuant to SB 676 is reasonable.

8. It is reasonable and efficient to pursue optional dynamic pricing structures for EV customers to promote VGI.

9. It is appropriate for the Commission to adopt the development and funding of government and LSE customer programs, incentives, and DER procurements as a non-SB 676 VGI strategy.

10. Designing wholesale market rules and access should be adopted as a non-SB 676 VGI strategy.

11. Pursuit of VGI pilots, demonstrations, emerging technologies, and studies is a reasonable VGI strategy and should be adopted as a non-SB 676 VGI strategy.

12. VGI pilots, demonstrations, and studies should accelerate and not delay implementation of VGI strategies.

13. It is reasonable to adopt accelerating the use of EVs for bi-directional non-grid-export power and PSPS resiliency and backup as a non-SB 676 VGI strategy.

14. Reforming interconnection rules to allow for more efficient integration of EVs into the grid to provide grid-related services should be adopted as a VGI strategy pursuant to SB 676.

15. The development, approval, and supported adoption of technical standards not related to interconnection should be adopted as a non-SB 676 VGI strategy.

16. VGI customer outreach and education should be adopted as a non-SB 676 VGI strategy.

17. The record demonstrates that the time is ripe to pursue certain near-term VGI objectives.

18. ALM is a worthy near-term VGI objective and should be promoted.

19. It is reasonable to explore the possibility of credit-for-export compensation as a near-term objective to advance VGI.

20. The ability of EVs to supply demand response is a near-term VGI objective that should be adopted by this decision.

21. Identification of the use cases that each VGI strategy supports is a near-term VGI objective that should be adopted by this decision.

22. Identification of how the large electrical corporations are integrating VGI across their relevant business activities is a near-term VGI objective that should be adopted by this decision.

23. VGI strategies should be consistent with the Commission's ESJ Action Plan.

24. It is reasonable to adopt certain equity requirements that would apply to some of the adopted VGI strategies and metrics.

25. Each of the VGI strategies adopted pursuant to SB 676 is in the best interests of ratepayers as defined by Section 740.8 and consistent with Section 451.

26. The goal of Section 740.12 referred to in Section 740.16 is the promotion of transportation electrification.

27. Each of the VGI strategies that should be adopted by this decision pursuant to SB 676 is consistent with the transportation electrification goals established by the Legislature in Section 740.12.

28. Any strategies adopted by this decision pursuant to SB 676 must maximize the use of "cost-effective" VGI, meaning that the strategies themselves need to be shown to be cost-effective at the time of establishment.

29. All VGI strategies that are not adopted pursuant to SB 676 should be adopted pursuant to the Commission's authority to advance VGI generally under the terms of this rulemaking and SB 350.

30. It is reasonable to adopt certain program metrics to measure the progress toward achievement of certain VGI strategies and near-term VGI objectives.

31. It is reasonable to adopt certain outcome metrics to measure the progress toward achievement of certain VGI strategies and near-term VGI objectives.

32. It is reasonable to order to collection of sub-categories for each of the program and outcome metrics adopted.

33. It is reasonable to adopt reporting obligations on each of the large electrical corporations as an VGI activity metric.

34. SB 676 requires the Commission to consider whether to order the large electrical corporations to apply the National Institute of Standards and Technology's reliability and cybersecurity protocols, or other equally protective or more protective cybersecurity protocols, to any technology that is deployed in pursuit of the VGI strategies adopted pursuant to SB 676.

35. Small and multi-jurisdictional utilities (SMJUs) should only be required to address VGI strategies in each application filed for transportation electrification programs and investments filed pursuant to Section 740.12 and to comply with limited reporting requirements.

O R D E R

IT IS ORDERED that:

1. Southern California Edison Company, San Diego Gas & Electric Company, and Pacific Gas and Electric Company shall each report on its Vehicle Grid Integration (VGI) activities as required by this decision, including:

customer programs and incentives related to VGI;

adoption of rates that encourage VGI and adoption of any mechanism to provide credit for export.

efforts to collaborate with the California Independent System Operator to design wholesale market rules and access that support VGI as defined by this decision;

use of Electric Program Investment Charge (EPIC) and/or other sources of funding for VGI technology demonstration projects;

efforts to accelerate the use of VGI for resiliency purposes;

progress to reform interconnection rules to advance VGI;

support and adoption of non-interconnection technical standards to advance VGI;

efforts to fund and launch VGI customer education;

any complementary policies needed to support Automated Load Management (ALM) technology;

number of ALM installed for any medium and heavy-duty vehicle segment(s) under currently approved transportation electrification programs as well as the expected avoided distribution and customer-side cost savings attributable to such ALM installations;

ALM deployment in its territory in the context of both existing and future transportation electrification programs;

VGI participation in its demand response programs;

implementation of any VGI pilots;

how it integrates VGI across its relevant business activities;

output-based metrics as described in this decision

consult with the Commission's Energy Division staff and interested stakeholders to create a reporting template as described by this decision; and

file "mid-term" reports annually starting on September 15, 2021 and ending September 15 2030; and shall file annual reports starting on March 2021 and ending March 15, 2031.

2. Southern California Edison Company, San Diego Gas & Electric Company, and Pacific Gas and Electric Company shall jointly provide an annual stocktake on actions outside of those ordered by this decision that will facilitate Vehicle Grid Integration (VGI) strategies, which shall address actions under the jurisdiction of the Commission as well as actions by other agencies and/or

organizations that would help realize a given VGI strategy adopted by this decision as part of their annual reporting.

3. Southern California Edison Company, San Diego Gas & Electric Company, and Pacific Gas and Electric Company shall each collaborate with the California Independent System Operator to design wholesale market rules and access that support Vehicle Grid Integration as defined by this decision.

4. Southern California Edison Company, San Diego Gas & Electric Company, and Pacific Gas and Electric Company shall, each, in all of its future applications for transportation electrification (TE) programs, including any rule or tariff to support TE infrastructure installation:

> identify how it will deploy customer-side Automated Load Management (ALM) at host sites where this technology will support TE installation at equal or lesser costs than hardware-based electrical capacity;
>
> describe its standard evaluation criteria to determine host sites where ALM would benefit ratepayers by reducing costs while meeting host site needs for electric vehicle charging;

5. Southern California Edison Company, San Diego Gas & Electric Company, and Pacific Gas and Electric Company shall, each, in all of its future applications for transportation electrification (TE) programs:

> identify strategies for educating host site customers on the benefits of 1) voluntarily passing time-of-use rate signals to electric vehicle drivers and, 2) participating in any demand response program(s) for which the host site customers are eligible;
>
> identify how it will establish outreach materials and load management tactics to reduce any grid impacts from host site customers that opt out of a default agreement to pass on time-of-use pricing;

contain a report on the number of site host customers (by location type) that opt out of passing through time-of-use rate signals and the alternative pricing signals they use;

identify how the transportation electrification programs proposed in the application will maximize the potential use of Vehicle Grid Integration (VGI) for on-site backup power;

identify relevant VGI use cases;

demonstrate that any VGI programs proposed consider the Commission's Environmental and Social Justice (ESJ) Action Plan;

provide increased incentive levels for ESJ communities if it proposes rebates to encourage VGI implementation;

document effective strategies for engagement with community-based organizations to seek their advice on VGI program design and implementation that appropriately prioritizes ESJ communities; and

document that it follows cybersecurity best practices for all TE equipment to be funded by the proposed application, such as those identified in *California Energy Systems for the 21st Century* and the National Institute of Standards and Technology's (NIST) *Framework for Improving Critical Infrastructure Cybersecurity*.

6. Southern California Edison Company, San Diego Gas & Electric Company, and Pacific Gas and Electric Company shall each provide customer education and evaluate customer acceptance once Automated Load Management systems are installed.

7. Southern California Edison Company shall file a Tier 2 advice letter within 90 days of the effective date of this decision describing the potential for deployment of Automated Load Management (ALM) technology and recommendations regarding deployment of ALM in the ChargeReady 2 program as authorized by Decision 20-08-045.

8. Southern California Edison Company, San Diego Gas & Electric Company, and Pacific Gas and Electric Company shall jointly host a workshop in the first quarter of 2021 to educate potential Vehicle Grid Integration (VGI) demand response providers on demand response opportunities and identify any barriers to participation for VGI resources. Southern California Edison Company, San Diego Gas & Electric Company, and Pacific Gas and Electric Company shall jointly develop the agenda for the workshop in collaboration with the Commission's Energy Division staff and shall serve notice of the workshop's date, time, and location not less than 10 days in advance to the service list of this proceeding and the service list for Application 17-01-012. Southern California Edison Company, San Diego Gas & Electric Company, and Pacific Gas and Electric Company shall jointly serve to the service list of this proceeding and the service list for Application 17-01-012 a post-workshop report within 30 days of the workshop that identifies any barriers to VGI participation in demand response programs, or any other programs such as bids for resource adequacy services to be delivered in 2022 per Decision 19-07-009.

9. Southern California Edison Company, San Diego Gas & Electric Company, and Pacific Gas and Electric Company shall jointly file a Tier 3 advice letter within 150 days of the effective date of this decision requesting approval of a proposed scope and budget for a Vehicle Grid Integration/Transportation Electrification Emerging Technology program as described in this decision. Southern California Edison Company, San Diego Gas & Electric Company, and Pacific Gas and Electric Company shall jointly consult with the California Energy Commission and other state agencies, other load serving entities (LSEs) conducting technology development activities; and other experts and stakeholders including Program Advisory Councils to help develop the

proposed program structure and scope. The advice letter shall also contain a proposed process to annually refine the program scope in consultation with these same entities. In the advice letter Southern California Edison Company, San Diego Gas & Electric Company, and Pacific Gas and Electric Company shall jointly propose and provide justification for a reasonable budget that reflects priority unfunded needs.

10. Southern California Edison Company, San Diego Gas & Electric Company, and Pacific Gas and Electric Company shall jointly report semi-annually to the Commission on the status, results to date, budget, challenges and lessons learned in the Vehicle Grid Integration/Transportation Electrification Emerging Technology program. The first report shall be due eight months after program approval. Southern California Edison Company, San Diego Gas & Electric Company, and Pacific Gas and Electric Company may jointly propose to combine this reporting with other types of reporting after obtaining agreement from the Commission's Energy Division. Southern California Edison Company, San Diego Gas & Electric Company, and Pacific Gas and Electric Company shall jointly disseminate research and program reports and other results via the Emerging Technologies Coordinating Council.

11. Southern California Edison Company, San Diego Gas & Electric Company, and Pacific Gas and Electric Company shall begin the planning process for Vehicle Grid Integration (VGI) pilots by jointly completing a stocktake to identify existing or planned pilots related to VGI that are funded by Southern California Edison Company, San Diego Gas & Electric Company, and Pacific Gas and Electric Company, other load-serving entities (LSEs), the California Energy Commission, or any other easily identifiable organization. Southern California Edison Company, San Diego Gas & Electric Company, and Pacific Gas and

Electric Company shall jointly provide a draft stocktake to the Commission's Energy Division staff for review within 30 days of the effective date of this decision and then serve the draft stocktake to the service list of this proceeding within 60 days of the effective date of this decision. Southern California Edison Company, San Diego Gas & Electric Company, and Pacific Gas and Electric Company shall jointly conduct a public workshop on the purpose and budgets of proposed VGI pilots within 90 days of the effective date of this decision and provide notice to the service list for this proceeding and Rulemaking 19-10-005. Prior to the workshop, Southern California Edison Company, San Diego Gas & Electric Company, and Pacific Gas and Electric Company shall jointly collaborate with staff from the Commission's Energy Division, the California Energy Commission, and other California LSEs to 1) develop a list of priority needs for pilots, 2) ensure that the list will avoid overlap with scope of the Electric Program Investment Charge program or other programs including programs administered by the California Energy Commission, and 3) ensure that the pilots will not delay the implementation of VGI strategies at scale that do not require piloting. Each of Southern California Edison Company, San Diego Gas & Electric Company, and Pacific Gas and Electric Company may file a Tier 3 advice letter requesting approval of VGI pilots, as described in this decision, within 210 days of the effective date of this decision. The large electrical corporations shall identify any non-ratepayer potential funding sources and shall not request, in their combined applications, more than $35 million.

12. Southern California Edison Company, San Diego Gas & Electric Company, and Pacific Gas and Electric Company shall jointly develop and implement strategies to prioritize environmental and social justice communities in siting and realizing the benefits of the Vehicle Grid Integration (VGI) pilots ordered by this

decision, including working with community-based organizations. Southern California Edison Company, San Diego Gas & Electric Company, and Pacific Gas and Electric Company shall jointly include equity strategies as a topic in the VGI pilots workshop ordered by this decision.

13. Southern California Edison Company, San Diego Gas & Electric Company, and Pacific Gas and Electric Company shall jointly develop certain Vehicle Grid Integration program metrics in consultation with the Commission's Energy Division staff on a program-by-program basis, as described in this decision.

14. Southern California Edison Company, San Diego Gas & Electric Company, and Pacific Gas and Electric Company shall jointly begin tracking the outcome metrics as described in this decision beginning January 1, 2021 (or continue to track this data where they are already collecting it for other purposes) and continue this tracking through December 31, 2030.

15. Southern California Edison Company, San Diego Gas & Electric Company, and Pacific Gas and Electric Company shall each, when collecting data to use for metric reporting ordered by this decision: 1) differentiate between residential and commercial customers, 2) for residential customer Vehicle Grid Integration (VGI) programs, propose environmental and social justice sub-categories for reporting program and outcome metrics and consider sub-categories for commercial customers after consultation with the Commission's Energy Division staff, 3) differentiate medium-duty and heavy-duty VGI use cases from light-duty VGI use cases, and determine whether additional segments are necessary after consultation with the Commission's Energy Division staff. For those sub-category definitions that require consultation with the Commission's Energy Division staff, each of Southern California Edison Company, San Diego Gas & Electric Company, and Pacific Gas and Electric Company shall ensure that such

consultation is completed no later than 90 days after the effective date of this decision, and that the results of the consultation are reflected as soon as is practicable in VGI metric reporting.

16. Southern California Edison Company shall prepare a workplan for a cybersecurity gap-analysis, as described by this decision, including the preparation of a public version with non-confidential information and confidential version for review by the Commission's Energy Division. Southern California Edison Company shall propose its workplan and work schedule via a Tier 2 advice letter filed no later than 180 days after the effective date of this decision.

17. Each of the Community Choice Aggregators (CCA) operating in utility territories subject to the Commission's jurisdiction shall describe how its current and planned activities (i.e. programs, rates, and investments in transportation electrification) are expected to further electric vehicle grid integration strategies. At a minimum, each CCA shall report on its activities and programs using relevant section(s) of the reporting template developed for large electrical corporation reporting. A CCA may request the creation of a template for use by CCAs with the agreement of the Commission's Energy Division staff. Each CCA shall also provide outcome-based metrics related to its role providing energy, including but not limited to load profiles for electric vehicle charging and participation, CCA demand response programs, and avoided greenhouse gases. CCAs may jointly report on any output metrics or other metrics with a large electrical corporation in their service territory. CCAs shall report by March 15, 2022 and annually through March 15, 2031.

18. Southern California Edison Company, San Diego Gas & Electric Company, and Pacific Gas and Electric Company shall each host a meeting with

Community Choice Aggregators (CCAs) that overlap with its service territory and other interested load-serving entities (LSEs) within 60 days of the effective date this decision. The topics to be discussed at the meeting shall be determined by the participants and may include, but are not limited to: 1) coordination topics identified in party comments, 2) policy recommendations from the Vehicle Grid Integration Working Group that identify both the large electrical corporation and other LSEs as lead or support organizations, 3) opportunities to collaborate on mandatory Senate Bill 676 reporting by CCAs and the large electrical corporation, and 4) future frequency of collaboration meetings.

19. Small and Multi-Jurisdictional Utilities (SMJUs) shall, in each application for transportation electrification programs and investments filed pursuant to Section 740.12, quantify how the investments described in the application are expected to further the electric vehicle grid integration strategies adopted by the Commission. The initial annual reporting of VGI metrics by each SMJU on March 15, 2022 is limited to activity-based metrics for any VGI strategies that the SMJU has adopted. After that date, they shall report annually on activity, program, and outcome metrics related to their VGI implementation strategies and policy actions.

20. Southern California Edison Company, San Diego Gas & Electric Company, and Pacific Gas and Electric Company shall designate a lead electrical corporation to develop and issue a Request for Proposals (RFP) for third party evaluation in consultation and coordination with the Commission's Energy Division. The lead electrical corporation shall share a draft scope of work consistent with the requirements of this decision with the Commission's Energy Division staff by June 15, 2022 and release the RFP by July 15, 2022.
The lead electrical corporation shall include the Commission's Energy Division

in the evaluation of bidders in response to the RFP. The evaluator will provide a draft report to the Commission's Energy Division staff for review by June 15, 2023. The final report will be due August 15, 2023.

21. Rulemaking 18-12-006 remains open.

This order is effective today.

Dated _____, at San Francisco, California.

APPENDIX A

Final Report of the California Joint Agencies Vehicle-Grid Integration Working Group

June 30, 2020

California Public Utilities Commission
DRIVE OIR Rulemaking (R.18-12-006)

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LIST OF TABLES AND FIGURES

LIST OF ANNEXES (Included in a Separate Document)

Disclaimer: This report does not address every aspect of VGI, but rather provides a starting point for further rulemaking, policy, and programs for VGI by the California Public Utilities Commission and other state agencies and entities. Recognizing that it serves only as a starting point, this report provides a collective expression of the Working Group rather than a record of individual participant positions. In converging on answers, Working Group participants mostly agreed, but the materials, statements, and recommendations do not necessarily represent the statements or recommendations of individual Working Group participants or the stakeholders they represent.

LIST OF ACRONYMS

ADA	Americans with Disabilities Act
AQMD	Air Quality Management District
B2B	Business-to-Business
B2C	Business-to-Consumer
BTM	Behind-the-Meter
C&I	Commercial and Industrial
CAISO	California Independent System Operator
CARB	California Air Resources Board
CCA	Community Choice Aggregator
CEC	California Energy Commission
CESA	California Energy Storage Alliance
CPUC	California Public Utilities Commission
DCFC	Direct Current Fast Charger
DER	Distributed Energy Resource
DERP	Distributed Energy Resource Provider
DOE	Department of Energy
DRAM	Demand Response Auction Mechanism
EDU	Electricity Distribution Utility
EE	Energy Efficiency
EPIC	Electric Program Investment Charge Program (CEC)
ESDER	Energy Storage and Distributed Energy Resources Program (CAISO)
EV	Electric Vehicle
EVSE	Electric Vehicle Service Equipment
FERC	Federal Energy Regulatory Commission
FTM	Front-of-the-Meter
GHG	Greenhouse Gas
GRC	General Rate Case
IDER	Integrated Distributed Energy Resources
IEEE	Institute of Electrical and Electronics Engineers
IOU	Investor-Owned Utility
ISO	Independent Service Operator
kW	Kilowatt
kWh	Kilowatt-hour
LCFS	Low Carbon Fuel Standard
LDV	Light Duty Vehicle
LSE	Load Serving Entity
ME&O	Marketing, Education and Outreach
MHDV	Medium- and Heavy-Duty Vehicle
MUA	Multiple Use Application
MUD	Multi Unit Dwelling
NEC	National Electrical Code
NEM	Net Energy Metering
NGR	Non-Generator Resource
OCPP	Open Charge Point Protocol
OEM	Original Equipment Manufacturer
OIR	Order Instituting Rulemaking
PDR	Proxy Demand Resource
PEV	Plug-in Electric Vehicle
PG&E	Pacific Gas and Electric
PSPS	Public Safety Power Shutoff
PUC	Public Utility Commission
PV	Photovoltaic
RA	Resource Adequacy
RE	Renewable Energy
RFP	Request for Proposals
SB	(California) Senate Bill
SCE	Southern California Edison
SDG&E	San Diego Gas & Electric
SFH	Single Family Home
SGIP	Self-Generation Incentive Program
TCO	Total Cost of Ownership
TEF	Transportation Electrification Framework
TNC	Transportation Network Companies
TOU	Time-of-Use
UL	Underwriters Laboratories
V1G	EV unidirectional charging
V2G	Vehicle-to-Grid (bidirectional)
V2H	Vehicle-to-Home (bidirectional)
V2M	Vehicle-to-Microgrid (bidirectional)
VGI	Vehicle-Grid Integration

PARTICIPANTS OF THE VGI WORKING GROUP

33North Energy
AEYCH
Alliance for Automotive Innovation
Amazon
Amzur
Argonne National Laboratory
Audi
Auto Alliance
Autos Innovate
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BMW
California Electric Transportation Coalition
California Independent System Operator
CALSTART
California Air Resources Board
California Energy Commission
California Energy Storage Alliance
ChargePoint
Charles Botsford (independent)
Columbia University
California Public Utilities Commission
Daimler
East Bay Community Energy
Electric Auto Association
Electrify America
Enel X
Energy and Environmental Economics
Energy Innovation
ENGIE Impact
EVBox
EVgo
Fermata Energy
Fiat Chrysler
Ford
General Motors
Green Power Institute
Greenlots
Gridworks
Honda
Hubject
Karim Farhat (independent)
Kisensum
Kitu Systems
Los Angeles Department of Water and Power
Lehigh University
Mercedes
Nissan
Natural Resources Defense Council
Nuvve
Olivine
OpenADR Alliance
Pacific Gas and Electric
Paratelic Ventures
Peninsula Clean Energy
Plug-In America
Public Advocates Office
QualityLogic
Resource Insights
Sacramento Municipal Utility District
San Diego Gas & Electric
Santa Clara Valley Transportation Authority
Schatz Energy Research Center
SEI Innovation
Siemens Digital Grid
Small Business Utility Advocates
Smart Cities
SolarEdge
Southern California Edison
Starboard Energy
Strategen
Sumitomo Electric Group
TeMix
Tesla
The Mobility House
ThinkSmartGrid
Toyota
Union of Concerned Scientists
University of California Berkeley
University of California San Diego
University of Delaware
US Department of Energy
US Federal Energy Regulatory Commission
Vehicle-Grid Integration Council
Wallbox
Willdan
WSP

EXECUTIVE SUMMARY

Overview

To realize its vision of a carbon-neutral economy, California has set a target of 5 million zero-emission vehicles on the road and 250,000 charging ports in service by 2030 and has expressed an intent to "reduce costs or mitigate cost increases for all ratepayers due to increased usage of electric vehicles by accelerating electric vehicle grid integration…"[1]

A definition of VGI is codified in California Public Utilities Code Section 740.6:

> "Electric vehicle grid integration" means any method of altering the time, charging level, or location at which grid-connected electric vehicles charge or discharge, in a manner that optimizes plug-in electric vehicle interaction with the electrical grid and provides net benefits to ratepayers by doing any of the following: (a) increasing electrical grid asset utilization; (b) avoiding otherwise necessary distribution infrastructure upgrades; (c) integrating renewable energy resources; (d) Reducing the cost of electricity supply; and (e) offering reliability services consistent with Section 380 or the Independent System Operator tariff.

To help realize these goals and methods, the California Independent System Operator (California ISO), California Energy Commission (CEC), California Air Resources Board (CARB), and California Public Utilities Commission (CPUC) jointly created the Vehicle Grid Integration (VGI) Working Group. A 2019 Ruling of the CPUC tasked the Working Group with addressing the following questions:

(a) What VGI use cases can provide value now, and how can that value be captured?
(b) What policies need to be changed or adopted to allow additional use cases to be deployed in the future?
(c) How does the value of VGI use cases compare to other storage or DER?

The VGI Working Group worked collaboratively between August 2019 and June 2020 to address these three questions. The Working Group was made up of diverse representatives of VGI stakeholders, including state agencies, utilities, community choice aggregators, the California ISO, electric vehicle (EV) manufacturers, battery manufacturers, charging network and energy service providers, advocacy and research groups, industry associations, and ratepayer interest groups. The organization Gridworks was engaged to facilitate the Working Group and create this report of its outcomes and recommendations.

Limits of the Report

The Working Group provided extensive perspectives on PUC Questions (a) and (b). However, due to time, data, and expertise constraints, the Working Group could only suggest ways in which the CPUC might pursue answers to PUC Question (c) in the future. The Working Group also faced limitations in getting private-sector cost information and could only assess costs on a relative basis, precluding cost-benefit analysis or assessment of net value. And the Working Group faced limitations in fully assessing barriers to VGI, including customer interest and acceptance, as well as the costs of eliciting participation in VGI programs, such as marketing and dealership education.

[1] See footnotes in the Introduction for all references and citations.

Why VGI Now?

The Working Group was both mandated and motivated by a conviction that VGI affords many potential benefits, including:

- Accelerating the adoption of EVs by providing additional revenue streams that lower the total cost of vehicle ownership for individual owners and fleet operators
- Reducing costs to electricity ratepayers by reducing congestion on existing power distribution infrastructure and costly distribution system upgrades, as well as reducing the need to invest in new fossil-fuel electricity generation
- Supporting further decarbonization of the electric sector by avoiding curtailment of renewables and providing grid services
- Accelerating reduction of carbon and criteria pollutant emissions in the transportation sector
- Improving grid resiliency and security, including for public safety power shutoff (PSPS) events

Opportunities to realize these benefits are available today and will grow rapidly as EV adoption expands. However, much depends on what happens in the next few years, including shaping electricity customers' attitudes towards VGI as more and more customers purchase EVs.

VGI Use Case Definition and Value

As summarized in Section A of this report, the Working Group first collaborated to develop a VGI use case framework to define, screen, evaluate and prioritize potential VGI use cases. Use cases represent the different ways in which EV charging can be integrated with the grid (or home/local power system) to provide value. Use cases help articulate how value streams can flow to different stakeholders, including EV owners and fleet managers, workplaces and other charging site hosts, charging service providers, utilities and CCAs, ratepayers, and grid operators. Use cases can serve as the building blocks for defining, creating and exchanging value from VGI among these stakeholders, and policy-making should recognize that different use cases may require different policies to help realize these value streams.

The framework developed provides a structuring of the potential VGI market. It recognizes comprehensively the key factors shaping VGI: where the vehicle would be charged/discharged, types of vehicles, services that EV charging can provide, power flow to and/or from the vehicle, control mechanisms for charging or discharging, degree of alignment of actions by the vehicle operator and the charger operator, and the characteristics of charging technologies. The Working Group used this framework to systematically explore the universe of VGI potential and answer the first question before the Working Group, **"what VGI use cases can provide value now?"**

What emerged are 320 different VGI use cases that, for the purposes of this report, should be considered as able to provide value by 2022. These use cases address VGI across a wide range of sectors (e.g., residential, commercial, rideshare, and fleets), applications (e.g., for customer bill management, renewable energy integration, or distribution upgrade deferral), approaches to control charging and/or discharging (direct and indirect), and types of charging (V1G and V2G). Both light-duty vehicles (i.e., passenger and ride-share vehicles) and medium- and heavy-duty vehicles (i.e., trucks, buses, and vans) are represented by the use cases.

However, the value perceived by Working Group participants for these use cases varied widely on a broad spectrum. Therefore, it is clear that these 320 use cases should not all be treated equally in policy-making, but should be differentiated across a spectrum of value. Furthermore, many other use cases developed by the Working Group have the potential to provide value in the medium- and long-term.

Answers to the question of how to capture the value of these use cases are addressed by the policy recommendations in Section B of this report.

Defining Key Terminology

V1G is single-direction charging that allows managed charging and flexible demand ("demand response")

V2G (vehicle-to-grid) is bidirectional charging and discharging, allowing vehicles to discharge stored energy back onto the grid or into a building or local power system.

Indirect (passive) control of charging involves adjusting the EV charge/discharge based on time-varying price signals or grid conditions. Charging behavior in response to such signals is not prescribed or commanded, and can occur passively without any response required by an individual customer.

Direct (active) control of charging involves adjusting the EV charge/discharge in response to active external "dispatching instructions" that prescribe or command charging behavior. EV participation in the Demand Response Auction Mechanism (DRAM) would be a good example of active aggregated charging.

Differentiating Among Use Cases

Although the Working Group did not conduct cost-benefit analysis nor rank these use cases explicitly, it did consider several ways to differentiate use cases that were scored highly by the Working Group in terms of benefits, costs, and ease/risk of implementation. Such highly-scored use cases illustrate different aspects of value. However, the Working Group could not differentiate among use cases using cost-effectiveness or net value.

One key differentiator among these potential use cases is the benefits they provide through their applications and control approaches. Many use cases scored highly by the Working Group related to:

- Customer bill management
- Avoiding or deferring investment in upgrading the power distribution grid
- Home and building backup power and resiliency
- Daytime charging to support balancing and storing renewable energy
- Indirect (passive) control approaches, such as time-varying retail rates and responding to informational signals of grid conditions (i.e., carbon signals or real-time wholesale energy prices) that do not require specific customer behavioral responses

The total statewide benefit from a single use case ranged up to an estimated $200 million per year based on scoring of the use cases by Working Group participants (see Section A for scoring details).

While the Working Group recognized the challenge of simultaneously advancing 320 use cases, ***an important result is that there are many potential VGI use cases that can provide value, and that the potential market for VGI solutions is diverse and interwoven across a broad swath of the transportation and power sectors.*** Given the use case assessment work performed by the Working Group, it appears that the work of developing markets for VGI solutions will demand persistent action for the next several years. ***California should take an inclusive and collaborative approach to VGI opportunities given the evolving nature of the regulatory and market landscape.***

Focus on V2G and on Medium- and Heavy-Duty Vehicles

There are several key ways to differentiate use cases within the VGI landscape that give shape to the Working Group's policy recommendations, including V2G as distinct from V1G, medium- and heavy-duty as distinct from light-duty. Light-duty V1G use-cases such as residential customers charging at single-family homes on time-varying rates are generally more familiar. The Working Group made a conscious effort to explore and promote medium- and heavy-duty and V2G use cases. Through this effort the Working Group recognized the benefits unique to these use cases and emphasized recommendations to overcome barriers for them.

Policy Recommendations

The Working Group built off its successful definition and valuation of VGI use cases to consider the second question before the Working Group, **"what policies need to be changed or adopted to allow additional use cases to be deployed in the future?"** The overriding intent of this process was to create actionable specific recommendations for consideration by California's state agencies, investor-owned utilities, community choice aggregators, the California ISO, and others.

As summarized in Section B of this report, the Working Group developed a set of 92 individual recommendations for policy actions that California state agencies, utilities, community choice aggregators, and CAISO could undertake to advance VGI in the short-term (2020-2022), medium-term (2023-2025), and long-term (2026-2030). These recommendations are separated into 11 different policy categories. Together, these 11 categories broadly address virtually all aspects of policy support for the VGI use cases:

#	Category
1	Reform retail rates
2	Develop and fund government and LSE customer programs, incentives, and DER procurements
3	Design wholesale market rules and access
4	Understand and transform VGI markets by funding and launching data programs, studies and task forces
5	Accelerate use of EVs for bi-directional non-grid-export power and PSPS resiliency and backup
6	Develop EV bi-directional grid-export power including interconnection rules
7	Fund and launch demonstrations and other activities to accelerate and validate commercialization
8	Develop, approve, and support adoption of technical standards not related to interconnection
9	Fund and launch market education & coordination
10	Enhance coordination and consistency between agencies and state goals
11	Conduct other non-VGI-specific programs and activities to increase EV adoption

Of the 92 policy recommendations made by the Working Group, the following 23 constitute the most urgent recommendations with the strongest level of agreement by a majority of participants:

Category	Policy Recommendations (*)
1	Create an "EV fleet" commercial rate that allows commercial and industrial customers to switch from a monthly demand charge to a more dynamic rate structure
2	Require utilities to broadcast signals to a DER marketplace of qualified vendors (curtailment and load) V2G systems become eligible for some form of SGIP incentives Enable customers to elect BTM load balancing option to avoid primary or secondary upgrades, either if residential R15/16 exemption goes away, or as an option for non-residential customers Consider coordinated utility and CCA incentives for EVs, solar PV, inverters, battery storage, capacity, and EV charging infrastructure to support resilience efforts in communities impacted by PSPS events Allow V1G and V2G to qualify for SGIP to level the playing field with incentives for other DERs, but V1G would get less incentive compared to V2G based on permanent load shift logic Incentive(s) for construction projects with coincident grid interconnection and EV infrastructure upgrade Enable customers, via Rules 15/16 or any new EV tariff, to employ load management technologies to avoid distribution upgrades, and focus capacity assessments on the Point of Common Coupling
4	Use EPIC, ratepayer, US DOE, and/or utility LCFS funds for an on-going, multi-year program to convene VGI data experts to study lessons learned, quantify VGI/DER net value, fund new data sources, and address other topics
5	Pilot funding for EV backup power to customers not on microgrids, including state-wide goals for at least 100 EVs by 2021 and 500 EVs by 2022; utilities to consider the feasibility of EVs for emergency backup generation in PSPS plans and resiliency solutions
6	Pilot funding for V1G and V2G for microgrid and V2M solutions, including a state-wide near-term goal; and utilities' PSPS plans and microgrid frameworks should consider EVs for FTM grid services
7	Focusing on resiliency and backup application in workplace and multi-unit dwellings, leverage EPIC funding to pilot use-cases to understand and reduce costs and to streamline implementation. Create pilots to demonstrate V2G's ability to provide the same energy storage services as stationary systems and let V2G systems participate in pilots for stationary storage Special programs and pilots for municipal fleets to pilot V2G as mobile resiliency Demonstration to define the means to allow aggregators, EV network providers, and charge station operators to dynamically map the capacity and availability of EVSE resources, using open standards Use EPIC, ratepayer, USDOE, and/or utility LCFS funds ($50M) in many competitively bid large-scale demonstrations of promising VGI use cases to provide data needed to scale up VGI efforts (e.g., validate consumer acceptance, incentive levels, security, net value, and communication pathways) Study to understand the impact on the distribution grid and generation system from EVs based on over ten existing/planned mandates from CARB & AQMDs to meet California 2045 carbon neutral goal
9	Create public awareness and education programs and materials on V2G systems and how to get them. This could particularly be focused toward government fleets Optimize CALGreen codes for VGI and revise to require more PEV-ready parking spaces and expand to existing buildings
10	State agencies coordinate and maintain consistency on TE and VGI across the different policy forums with no duplication of regulation, clear roles and vision on VGI and priority on state TE goals over VGI Incentivize use of multiple open standards for VGI communication, charging networks, cloud aggregators, and site hosts
11	Streamline permitting for charging infrastructure Create Incentives for charging infrastructure for new public parking lot construction projects

(*) This table is based on Table 9 in Section B, "Short-Term Policy Recommendations with Strong Agreement."

These policy recommendations, along with the many others also described in this report and supported by participants, reflect the strength and diversity of the Working Group's recommendations on:

- V1G and V2G
- Light-, medium-, and heavy-duty vehicles
- Short-, medium-, and long-term
- Actions needed by individual agencies or LSEs and those requiring collaboration across jurisdictions

Section B gives a full account of all policy recommendations, as well as valuable dissenting perspectives. Annex 1 provides links to the full set of materials developed by the Working Group, which include extensive additional information on the policy recommendations, such as full descriptions, further comments, metrics, strategies, lead and supporting agencies/entities, barriers, and relevant use cases.

Valuing VGI Relative to Other Distributed Energy Resources

The Working Group was challenged by the third question, "**how does the value of VGI use cases compare to other storage or DERs?**" and does not offer a complete response at this time. Challenges included:

- Limited insight into the costs of VGI resources and limited availability of cost data
- Limited expertise by many participants in storage and other DERs
- Lack of time and resources to conduct the necessary quantitative analytics and literature reviews
- Lack of a developed framework and analysis criteria to make true "apples-to-apples" comparisons

While the Working Group could not respond in full, Section C of this report contributes substantially to resolving this question by organizing the challenges and potential approaches to achieving resolution. Further efforts to compare VGI use cases with other DERs can recognize and incorporate the wealth of work and perspectives on VGI use cases produced by the Working Group.

Next Steps

The VGI Working Group is proud to present this report and associated materials. Working Group participants were motivated by a conviction that VGI affords many potential benefits. Many opportunities to realize these benefits are available today and will grow rapidly as EV adoption expands, as shown by the extensive work completed by the Working Group on use case assessment and policy recommendations. This work provides a solid foundation for the next stages of VGI in California, and the Conclusion section of this report provides a number of clear next steps.

The high degree of cooperation and collaboration achieved among 85 participating organizations and individuals during the ten-month course of the Working Group also demonstrates that VGI is a unique and effective convening umbrella or venue for fostering collaboration between the electric power and EV/charging sectors, and among many types of industry, government, advocacy, research, and utility and CCA stakeholders.

The VGI Working Group, consisting of participants voluntarily contributing their limited time and resources, commends this report to the leaders of the California ISO, CEC, CARB, and CPUC. We ask for thoughtful consideration of these recommendations and a timely response to this plea.

INTRODUCTION

To realize its vision of a carbon-free economy, California has set a target of 5 million zero-emission vehicles on the road and 250,000 charging ports in service by 2030.[2] California has also expressed an intent to "reduce costs or mitigate cost increases for all ratepayers due to increased usage of electric vehicles by accelerating electric vehicle grid integration."[3] Today California already leads the nation in electric vehicle (EV) adoption with over 700,000 EVs on the road.[4]

Fueling millions of EVs is both a challenge and an opportunity for California's grid and customers. The California Independent System Operator (California ISO), California Energy Commission (CEC), California Air Resources Board (CARB), and California Public Utilities Commission (CPUC), along with other state agencies and organizations, have each invested significant effort to investigate how EVs can be best integrated with the electric grid.[5]

One key focus of California state agencies has been to understand how to integrate incremental electric vehicle load in a way that creates value to the grid, to utilities, and to customers, and identify strategies to capture and scale that value. If charging occurs during existing peak periods, California may (1) need to invest in new distribution infrastructure and generation, (2) face new grid operational challenges, and (3) see increased emissions from the electric sector.[6] Conversely, charging behavior that avoids peak periods in favor of times that are optimal to both the customer and the grid presents an opportunity. If EV load can be managed or vehicles can be configured to export power to the grid, new investment, operational challenges and emissions increases can be avoided, all while reducing emissions from the transportation sector and providing new, more affordable mobility.

There are also challenges and opportunities for EVs in the context of wildfire risk and California's Public Safety Power Shutoffs (PSPS). Some customers may be hesitant to adopt EVs for fear that charging during an outage would be impossible. Other customers may see an opportunity, using Vehicle-to-Building (V2B) technology to provide onsite backup power or Vehicle-to-Grid (V2G) options to support grid resilience.

Opportunities for integrating EVs with the grid have collectively been called Vehicle Grid Integration (VGI). California's Public Utilities Code Section 740.16 defines VGI as follows: [7]

> "Electric vehicle grid integration" means any method of altering the time, charging level, or location at which grid-connected electric vehicles charge or discharge, in a manner that optimizes plug-in electric vehicle interaction with the electrical grid and provides net benefits to ratepayers by doing any of the following: (a) Increasing electrical grid asset utilization; (b) Avoiding otherwise necessary distribution infrastructure upgrades; (c) Integrating renewable

[2] Executive Order B-48-18; https://www.ca.gov/archive/gov39/2018/01/26/governor-brown-takes-action-to-increase-zero-emission-vehicles-fund-new-climate-investments/index.html
[3] California Public Utilities Code Section 740.6 (a)(D)(2)
[4] https://www.veloz.org/wp-content/uploads/2020/02/12_Q4_2019_Dashboard_PEV_Sales_veloz.pdf
[5] https://www.caiso.com/Documents/Vehicle-GridIntegrationRoadmap.pdf; https://www.cpuc.ca.gov/vgi/; https://www.energy.ca.gov/programs-and-topics/programs/california-vehicle-grid-integration-roadmap-update
[6] Vehicle-Grid Integration Initiative 4/12/19; https://gridworks.org/wp-content/uploads/2019/05/VGI_4.12-Slides.pdf
[7] California's Public Utilities Code Section 740.16; https://leginfo.legislature.ca.gov/faces/billTextClient.xhtml?bill_id=201920200AB983

energy resources; (d) Reducing the cost of electricity supply; (E) Offering reliability services consistent with Section 380 or the Independent System Operator tariff" [8]

VGI can include a range of solutions, from passive interventions such as time-varying (or time-of-use) electricity rates that give customers pricing signals to incentivize or disincentivize charging during specific time windows, to active solutions that leverage the EV's battery to modulate the vehicle's charge or discharge into the grid. VGI has the potential to provide a wide range of benefits for the adopting customers, electricity ratepayers, their electricity service providers, grid operators, and the overall environment and society.

Scoping of the VGI Working Group

As part of California's continuing policy-making efforts for accelerating the adoption of EVs and for realizing the multiple benefits of EVs, the CPUC instituted in 2018 an Order Instituting Rulemaking (OIR) to Continue the Development of Rates and Infrastructure for Vehicle Electrification (R.18-12-006), also called the "DRIVE OIR."[9] An associated May 2, 2019 Scoping Ruling and Memo ordered a new interagency, multi-stakeholder VGI Working Group to focus on identifying the costs and benefits of VGI use cases, tied to the goals set forth in the 2018 OIR.[10]

The Working Group was scoped to evaluate use cases for direct and indirect managed charging, including use cases for single-direction charging for responding to time-varying rates and dispatched demand-response (commonly referred to as V1G), bidirectional use cases in which vehicle batteries can discharge stored energy back onto the grid (vehicle-to-grid or V2G), and bidirectional use cases in which vehicle batteries discharge only behind-the-meter (vehicle-to-building/home or V2B/V2H).[11] As directed in the R.18-12-006 Scoping Ruling, the Working Group was to, at a minimum, cover the following questions:

(a) What VGI use cases can provide value now, and how can that value be captured?
(b) What policies need to be changed or adopted to allow additional use cases to be deployed in the future?
(c) How does the value of VGI use cases compare to other storage or DER?

The Working Group collaborated between August 19, 2019 and June 30, 2020 developing, discussing, and converging on answers to these three questions (henceforth called "PUC Questions"). Over 85 organizations and individuals actively participated, including state agencies, investor-owned utilities (IOUs), community choice aggregators (CCAs), municipally owned utilities (MOUs), the California ISO, EV manufacturers, battery manufacturers, charging network and energy service providers, advocacy groups, industry associations, research and academic institutions, and ratepayer interest groups. This

[8] SB 676; http://leginfo.legislature.ca.gov/faces/billTextClient.xhtml?bill_id=201920200SB676
[9] R.18-12-006 Development of Rates and Infrastructure for Vehicle Electrification and Closing OIR; https://docs.cpuc.ca.gov/SearchRes.aspx?DocFormat=ALL&DocID=252025566; this rulemaking followed a 2017 "VGI Communications Protocol Working Group" as noted in the DRIVE OIR, during which parties requested that the working group process be continued, leading to the present Joint Agencies VGI Working Group scoped in the DRIVE OIR.
[10] May 2, 2019 Scoping Ruling and Memo; https://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M285/K712/285712622.PDF
[11] Ibid. Managed charging is defined here as a coordinated shift/modulation of the time or level of EV charging or discharging in response to a variety of possible external signals, either passively or actively. Other literature may take a narrower view of the meaning of managed charging, such as limiting it to direct (active) control only.

level of participation, expertise, and perspectives was fundamental to the success of the Working Group. The organization Gridworks, an experienced facilitator on VGI and DERs more broadly in California and elsewhere, facilitated the process.

Participants contributed through a regular series of workshops, conference calls, submissions of materials, and reviews. A broad range of experts and stakeholders conducted use case assessment, including group-based and individual-based use-case screening and scoring, developed policy recommendations, and took part in an extended survey on the policy recommendations. All together this generated hundreds of recommendations and tens of thousands of individual data points on participant assessments, opinions, and comments.

Community Choice Aggregation and VGI

Community Choice Aggregators (CCAs) participated actively in the Working Group, supporting the creation of recommendations for all Load Serving Entities (LSEs). As nonprofit public entities governed by the cities, counties and towns that they serve, CCAs now represent a large driver of clean energy in California. As electricity suppliers to public sector, residential, business and industry customers, CCAs possess relevant customer data and are using that data to inform programs for transportation electrification. As CCAs continue to expand their transportation electrification programs, coordination and planning between CCAs and IOUs on VGI will be essential.

Limits of the Report

The Working Group provided extensive perspective on PUC Questions (a) and (b). However, due to time, data, and expertise constraints, the Working Group could only suggest ways in which the CPUC might pursue answers to PUC Question (c) in the future.

This report does not address every aspect of VGI, but rather provides a starting point for further rulemaking, policy, and programs for VGI by the CPUC and other state agencies. Recognizing that it serves only as a starting point, this report provides a collective expression of the Working Group rather than a record of individual participant positions. In converging on answers, Working Group participants mostly agreed, but the materials, statements, and recommendations do not necessarily represent the statements or recommendations of individual Working Group participants or the stakeholders they represent.

While focusing on the three PUC Questions, the Working Group deemed some issues out of scope or beyond its ability and time to address, including: net-benefit analysis that directly compares benefits to costs; realistic detailed cost data on use cases; comprehensive treatment of barriers to VGI; and customer acquisition expenses and outreach needed to get customers to participate in VGI programs (e.g., incentives, marketing, dealership education).

Stages of the Working Group and Connection to Other VGI Efforts

Over the ten-month period the Working Group proceeded in four distinct stages (Table 1). The materials produced by the Working Group over these four stages are mapped and linked in Annex 1. The process through which the Working Group developed these materials is described in Annex 2. And further

reference material is provided in Annex 3. In addition to answering PUC Questions (a) and (b), the Working Group produced a great wealth of materials containing recommendations, comments, frameworks, and perspectives on VGI for the short-, medium-, and long-term.

The VGI Working Group conducted its work with the full recognition of the many other ongoing and planned efforts by California state agencies and other entities to address transportation electrification.[12] These include the new mandates of California Senate Bill (SB) 676 for supporting transportation electrification to 2030[13], the Transportation Electrification Framework[14], an updated CEC VGI Roadmap in progress[15], CALGreen building code updates[16], SGIP program revisions[17], the Rule 21 interconnection proceeding[18], the microgrids proceeding[19], CPUC rates proceedings[20], CEC EPIC funding[21], and many initiatives by private entities, IOUs, CCAs, and other Load Serving Entities (LSEs).

Table 1: Four Stages of the VGI Working Group

Stage	Dates	Materials Produced
1. Methodology	8/19/19-10/31/19	Developed and agreed upon a basic use case assessment framework and methodology that defines over 2500 potential VGI use cases.
2. Use case assessment: PUC Question (a)	9/30/19-1/30/20	Identified and screened 1060 distinct use cases that could potentially provide value, using screens for technological feasibility, market maturity, customer acceptance and adoption, and data availability. Scored use cases that passed screening in terms of benefits, costs, and ease/risk of implementation. Identified over 300 use cases deemed to provide value in the short-term to 2022, and many additional use cases that could potentially provide value in the medium- and long-term.
3. Policy recommendations: PUC Question (b)	1/31/20-6/4/20	Developed and consolidated policy recommendations into a set of 92 discrete recommendations in 11 categories with extended supporting descriptions and accompanying state agency and CAISO comments. Then surveyed participants on their agreement with these recommendations, the clarity and relevance of the recommendations, and further written comments, receiving over 9,000 survey datapoints.
4. DER comparisons: PUC Question (c)	4/16/20-5/15/20	Suggested further action by the PUC in comparing VGI use cases with other DER use cases, but did not provide an answer to PUC Question (c).

[12] Among the materials generated by the Working Group were "stock-takes" of existing efforts by state agencies, the California ISO, and CCAs; see links in Annex 1.
[13] SB676 ; https://leginfo.legislature.ca.gov/faces/billTextClient.xhtml?bill_id=201920200SB676
[14] SB 350 Transportation Electrification Programs; https://www.cpuc.ca.gov/sb350te/, (D.18-05-040); https://www.cpuc.ca.gov/WorkArea/DownloadAsset.aspx?id=6442457637
[15] CEC VGI Roadmap; https://efiling.energy.ca.gov/Lists/DocketLog.aspx?docketnumber=18-MISC-04
[16] CALGreen (CCR, Title 24, Part 11); https://www.dgs.ca.gov/BSC/Resources/Page-Content/Building-Standards-Commission-Resources-List-Folder/CALGreen
[17] SGIP; https://www.cpuc.ca.gov/sgip/
[18] Rule 21 Interconnection Proceeding (R.17-07-007); https://www.cpuc.ca.gov/Rule21/
[19] Microgrids OIR (19-09-009); https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M314/K274/314274617.PDF
[20] Zero Emission Vehicle Rate Programs; https://www.cpuc.ca.gov/General.aspx?id=12184
[21] CEC Electric Program Investment Charge Program; https://www.energy.ca.gov/programs-and-topics/programs/electric-program-investment-charge-epic-program

Why Is VGI Important?

At the end of the Working Group, participants were asked why they had participated and why they thought that effort on VGI was worthwhile. Some responses were:

> VGI can provide key, material benefits to the EV driver: from financial incentives/rewards that help to lower the total cost of ownership, to confidence and assurance that their charging needs will be taken into account across all charging venues, to helping align their EV charging with renewable availability (appeals to the 'green' conscience). In this way, we see VGI as a key element in helping to enable and accelerate EV adoption. –Ford

> Intelligently marrying electric vehicles and the grid offers a significant opportunity to unlock value and benefits for EV drivers, ratepayers, industry stakeholders, and society overall. –General Motors

> VGI allows us to maximize the value of our EV charging technologies we are able to deliver to drivers, site hosts, utilities, and grid operators. –Enel X

> VGI is an integral part of ensuring that transportation electrification is clean, affordable, resilient, and simple. VGI should be proactively and thoughtfully included in transportation electrification strategies, plans, programs, and projects. VGI is also a key venue for automakers, utilities, charging providers, and others to come together to ensure a successful transition to the mobility future we seek. –ENGIE Impact

> Our interest lies in developing the electric transportation market. We want to do everything possible to reduce barriers to adoption during its growth phase. Through VGI, both the EV driving public and ratepayers will ultimately benefit. –Southern California Edison

The Working Group took note of the many benefits that VGI can provide. The comments above point to benefits that can include lowering total ownership costs for EV owners and fleet operators by providing additional revenue streams; reducing costs to electric ratepayers by limiting congestion on existing distribution infrastructure, the need for new fossil generation resources, and costly distribution system upgrades; supporting further decarbonization of the electric sector by avoiding curtailment of renewables and providing grid services; and accelerating reduction of carbon and criteria pollutant emissions from the transportation sector. Many other potential benefits are explained in Working Group materials and referenced literature provided in Annexes 1 and 3.

The Working Group also noted the ubiquitous nature of VGI potential across all customers and businesses, given the acceleration of EV adoption, and the unique role of VGI in fostering EV adoption. That is, VGI can reduce the total cost of ownership of electric vehicles, unlock new value propositions and revenue streams, and facilitate charging infrastructure investments. VGI-enabled EVs can also provide grid reliability services and help limit overall electricity system cost increases by providing lower-cost alternatives to traditional supply-side resources, and by mitigating the cost impacts of rising EV and renewable energy adoption.

And the Working Group also took note of several potentially unique attributes of VGI that can distinguish VGI from other traditional DERs and also provide complementary benefits to traditional DERs, although further understanding and experience is needed to confirm these attributes:[22]

- **Ubiquity.** EVs will become ubiquitous so applications and benefits can apply to a broad segment of utility customers, workplaces, and destinations.
- **Simplicity.** For at least some use cases, load flexibility via VGI may be relatively simple to implement, for example a smart charger that responds to time-varying price signals.
- **Fast and flexible response.** Charging may be able to respond quickly to event or price signals to provide high-capacity real-time flexibility for serving grid needs such as balancing renewable energy intermittency and supporting intra-day ramping.
- **Load shift capacity.** Residential charging represents long-duration loads that are generally quite able to shift given how long cars are parked and be responsive to TOU rates.
- **Leveraging of EV investments.** Investment in EVs themselves yields clean transportation benefits independent of VGI. VGI solutions can be incremental or additional in leveraging existing or planned investments in EVs and charging infrastructure.
- **Multiple benefit streams.** There is also the potential for "value stacking" in which multiple benefits or applications can be accrued simultaneously or at different times of day, so that there are multiple potential value streams from a single investment.
- **Resiliency.** There are unique resiliency benefits, at both the building-level and community-level, to counteract Public Safety Power Shutoffs (PSPS).
- **Locational flexibility.** EVs can respond to location-specific grid needs, as EVs in different locations can flexibly offer charging or discharging resources to the grid.
- **Cross-industry collaboration.** VGI is also a unique and effective convening umbrella or venue for fostering collaboration among entities in the electric power and EV/charging industries.

Senate Bill 676 and the VGI Working Group

During the course of the Working Group, Senate Bill (SB) 676 was enacted by the California legislature. SB 676 adds a new section 740.16 to the Public Utilities Code on the subject of transportation electrification. With the passage of SB 676, the CPUC, CEC, and other state agencies assumed further responsibilities with regard to charting and developing VGI policy in California to 2030. Per SB 676, "the commission shall establish strategies and quantifiable metrics to maximize the use of feasible and cost-effective electric vehicle grid integration by January 1, 2030."[23]

Although the scope of the VGI Working Group did not change in response to the passage of SB 676, the broad mandate of PUC Question (b) on policy recommendations allowed the Working Group to think longer term to 2030. The use cases identified by the Working Group are also relevant to the longer-term. The use case assessments described in Section A and the policy recommendations described in Section B should be considered by the CPUC as it provides guidance for California's regulated utilities to comply with the VGI requirements established in Public Utilities Code section 740.16.

[22] These bullets stem from a "targeted discussion" of the Working Group, but were not substantiated with data nor endorsed by the full Working Group as currently presented.
[23] SB 676; http://leginfo.legislature.ca.gov/faces/billTextClient.xhtml?bill_id=201920200SB676

SECTION A. PUC QUESTION (A): WHAT VGI USE CASES CAN PROVIDE VALUE NOW, AND HOW CAN THAT VALUE BE CAPTURED?

Use cases represent the different ways in which EV charging can be integrated with the grid (or home/local power system) to provide value. Use cases help articulate how value streams can flow to different stakeholders, including EV owners and fleet managers, workplaces and other charging site hosts, charging service providers, utilities and CCAs, ratepayers, and grid operators. Use cases can serve as the building blocks for defining, creating and exchanging value from VGI among these stakeholders, and policy-making should recognize that different use cases may require different policies to help realize these value streams.

The Working Group put forth 320 use cases which, for the purposes of this report, should be considered as "able to provide value now."[24] These use cases are given in Annex 5. Most Working Group participants agreed that no scored use case should be excluded from being considered as "able to provide value now," since all use cases that passed screening and received a benefit score indicated at least some value.[25]

However, the value perceived by Working Group participants for these use cases varied widely on a broad spectrum, when benefits, costs, and the ease and riskiness of implementation (related to barriers and many other factors) are taken into account. Therefore, it is clear that these 320 use cases should not all be treated equally in policy-making, but should be differentiated across a spectrum of value. Furthermore, many other use cases developed by the Working Group beyond these 320 use cases have the potential to provide value in the medium- and long-term.

Although the Working Group did not prioritize or rank these use cases explicitly, it also put forth a number of smaller groupings of these 320 use cases ("subsets") that were scored highly by the Working Group in terms of benefits, costs, and ease/risk of implementation. And although the Working Group did not choose any single one of these subsets to recommend above any other, the subsets nevertheless show different aspects of value and present a robust overview. Most Working Group participants also agreed that the answer to "how can that value be captured" is answered by the policy recommendations put forth in Section B, also considering the specific use cases to which a given policy could apply.

In order to assess use case value and answer PUC Question (a), one of the first tasks of the Working Group was to define and adopt a framework and methodology for assessing VGI use cases. The dimensions of the framework were purposely defined to be of most relevance to policy making, capturing those aspects of use cases that can be connected to, or are supported by, particular policy

[24] The 320 use cases are those receiving at least at least a partial benefit score from the scoring process described later in this section. This means that at least one participant scored the use case for benefits, either for the $/EV/year benefit metric, and/or for the metric total population of EVs that could participate by 2022. There was some debate about whether use cases scored on only one of these metrics be excluded, since the full benefit of multiplying the two metrics together could not be obtained, most participants agreed to include the use case if only one of these metrics was scored. Also, the conclusion that all use cases with benefits should, for the purposes of this report, be considered as "able provide value now" should only be interpreted as an answer to PUC Question (a), and does not imply that programs to enable these use cases necessarily maximize benefits and minimize costs.

[25] The conclusion that all use cases with benefits should, for the purposes of this report, be considered as "able to provide value now" should only be interpreted as an answer to PUC Question (a), and does not imply that programs to enable these use cases necessarily maximize benefits and minimize costs.

strategies. The framework also provides a foundation for connecting use cases to specific business models, although the Working Group in assessing use case value for PUC Question (a) did not consider business models associated with use cases.

The framework adopted by the Working Group consists of six dimensions for characterizing a use case. These are:

1. Sector. The Sector pinpoints where the vehicle is used and charged/discharged. It could be broadly grouped into residential and commercial categories, or subsets thereof (e.g. commercial school bus, or commercial public destination). The Working Group decided to employ 13 options for Sector.

2. Application. The Application refers to the service(s) VGI aims to provide. Applications can be broadly grouped into "customer applications" that focus on services to the electricity customer and/or EV owner/operator, and "system applications" that focus on services to the grid. While the prospect of "stacking" applications and their values is important, such that multiple applications and services can be delivered, the framework clarifies that "customer applications" and "system applications" should be treated separately and not stacked. The Working Group decided to employ 17 options for Application.

3. Type. The Type determines the power flow to and/or from the vehicle, whether uni-directional (V1G) or bi-directional (V2G). In this framework, "V2G" represents all bidirectional types including power flow exporting from the vehicle that may not reach the grid, such as for non-export "vehicle-to-home" (V2H) and "vehicle-to-building" (V2B) use cases.

4. Approach. Approach refers to the mechanism through which the vehicle's charge and/or discharge is controlled. Approach can be either indirect (passive) control or direct (active) control:

- Indirect (passive) control of charging involves adjusting the EV charge/discharge based on time-varying retail price signals or signals of grid conditions (i.e., carbon signals or real-time wholesale prices). Charging behavior in response to such signals is not prescribed or commanded, and can occur passively without any active response required by an individual customer.

- Direct (active) control of charging involves adjusting the EV charge/discharge in response to active external "dispatching instructions" that prescribe or command charging behavior. Aggregated charging and demand-response programs are good examples. The instructions may directly command charging behavior or may prescribe how to respond to other received signals such as time-varying prices or grid conditions.

5. Resource Alignment. Resource Alignment specifies whether the "EV actor" and the "EVSE actor" are "unified" meaning both the EV and EVSE are controlled and/or operated by the same actor, or "fragmented" meaning controlled and/or operated by different actors. If they are fragmented, then Resource Alignment further specifies whether the separate actors are "aligned" or not, meaning whether their intentions and incentives coincide or are different. Fragmented and misaligned use cases present the greatest potential for barriers. The "EV actor" is the party that controls and/or operates the electric vehicle, and "EVSE actor" is the party that controls and/or operates the electric vehicle charger under the utility meter. There are three logical options for Resource Alignment, shown in Table 2.

6. Technology. Technology identifies the hardware and software needed to realize the VGI opportunity. Technology considerations include, but are not limited to electric vehicle type, charging rate, charging

type (e.g. AC with mobile inverter, DC with stationary inverter), and communication requirements and pathways to EV and/or EVSE.

For each of the first five dimensions, the Working Group defined a specific set of options that could be chosen to define a given use case (Table 2).

Table 2. Dimensions of the Use Case Assessment Framework and Use-Case-Definition Options

Sector	Application	Type	Approach	Resource Alignment
Residential-Single-Family Home Residential-Single-Family Home, Rideshare Residential-Multi-Unit Dwelling Residential-Multi-Unit Dwelling Rideshare Commercial-Workplace Commercial-Public, Destination Commercial-Public, Destination Rideshare Commercial-Public, Commute Commercial-Public, Commute Rideshare Commercial-Fleet, Transit Bus Commercial-Fleet, School Bus Commercial-Fleet, Small Truck (class 3-5) Commercial-Fleet, Large Truck (class 6-8)	Customer-Bill Management Customer-Upgrade Deferral Customer-Backup, Resiliency Customer-Renewable Self-Consumption System-Grid Upgrade Deferral System-Backup, Resiliency System-Voltage Support System-Day-Ahead Energy System-Real-Time Energy System-Renewable Integration System-GHG Reduction System-RA, System Capacity System-RA, Flex Capacity System-RA, Local Capacity System-Frequency Regulation Up/Down System-Spinning Reserve System-Non-Spinning Reserve	V1G V2G	Indirect (passive) Direct (active)	Unified and Aligned Fragmented and Aligned Fragmented and Misaligned

For the sixth (technology) dimension, for medium-duty and heavy-duty vehicles (MHDV), the sector dimension covered the basic vehicle type -- large truck (class 6-8), small truck (class 2-5), airport shuttle bus, school bus, short-range transit bus, long-range transit bus, and transit shuttle van. However, the Working Group recognized that these four sectors needed to be further delineated for use case development and screening, given the multitude of potential MHDV vehicle and service types. Thus, the Working Group extended the technology dimension for MHDV to include the sub-type of vehicle and the type of service for which it is employed. That is, trucks and buses were optionally delineated into several specific technology variants by battery capacity, charger power, duty cycle, average mileage per route, daytime vs. nighttime charging, and other technology notes. This resulted in a number of discrete technology options (such as “Large Truck A”) when defining MHDV use cases. The MHDV sectors and vehicle types are diverse and such delineation was considered important for scoring. A similar

delineation of discrete technology options was not done for LDV use cases.[26] See Annex 4 for further details.[27]

Steps to Assess Use Case Value

The process adopted by the Working Group to assess use case value within this framework consisted of four steps.[28] The Working Group methodically went through each of these steps. The results are described below. See Annex 4 for more details of this process.

Step (a) Identify use cases potentially providing value
Step (b) Screen use cases based on whether seven criteria for providing value are met
Step (c) Score use cases in terms of potential benefits, costs, and ease/risk of implementation
Step (d) Rank use cases based on the scoring results of Step (c)

Step (a) Use case development (submissions from participants). Participants were invited to submit any number of use cases they believed should be considered, by providing the five dimensions of a specific recommended use case from those shown in Table 2. There were a total of 2,652 possible use cases to choose from in making submissions, defined by all possible permutations. In total, nineteen Working Group participants submitted a total of 1,060 unique use cases. The submitted use cases considered sectors, applications, types, approaches, and vehicle types and technology characteristics that could potentially provide value in the short-term ("now") timeframe to 2022, consistent with PUC Question (a).[29] However, the Working Group recognized that many of the submitted use cases, and many that were not submitted, could provide value in the medium- and long-term beyond 2022. It was particularly difficult to identify MHDV use cases for the medium- and long-term, given the many newly emerging types of electric MHDVs. Submitted use cases are available to view and download in the Use Case Assessment Database.[30]

Step (b) Screening. All 1,060 submitted use cases were then screened as either "pass" or "fail" for the short-term ("now") timeframe to 2022. This was done according to the methodology's seven screens for technological feasibility (Screen 1), wholesale and retail market participation rules (Screens 2a-2b),

[26] Different charger power levels were defined as technology variants for a handful of the LDV use cases; and ranges of battery capacity were noted for many of the use cases. However, the variations were much narrower and less diverse for LDVs than for MHDVs, in part due to the more standardized mass-market nature of LDVs.
[27] For more background on MHDV use cases, see also the white paper developed as part of the Working Group, "Development of Market Analysis and Use-Cases for Medium & Heavy-Duty Vehicle- Grid Integration," linked in Annex 1.
[28] The original methodology developed by the Working Group consisted of six steps, the first being the selection of the framework and the sixth being creating policy recommendations. The first step on selection of the framework is documented in the material provided in Annex 1 and further explained in Annex 2. This "first step" is not elaborated here because the focus of this report is on answering the PUC Questions and not on developing a methodology. The sixth step of the methodology is covered by the work described in Section B. The four steps (a)-(d) outlined here correspond to Steps 2-5 of the formal methodology referenced in Annexes 1 and 2.
[29] PUC Question (a) asks for use cases that can provide value "now." The Working Group engaged in considerable discussion of the meaning of "now" during the use case submission, screening, and scoring steps, and confirmed an understanding that "now" was the short-term period 2020-2022 for purposes of use case assessment. Beyond "now," the Working Group defined "medium-term" as 2023-2025 and "long-term" as 2026-2030 for the purposes of policy recommendations in Section B.
[30] The Use Case Assessment Database is available online at https://airtable.com/shrHTfpCQ7lFjFY9l. Database tables can be viewed and downloaded from that link, and Excel versions are also available directly via the links in Annex 1.

consumer adoption/acceptance (Screens 3a-3b), and availability of data needed to assess the use case (Screens 4a-4b). If a use case passed all seven screens, it was then scored by the Working Group in Step (c). The screening criteria were developed specifically in relation to PUC Question (a) as providing value in California by 2022. The screening resulted in 355 use cases "passing" as potentially providing value by 2022.[31] There were also over 1000 individual comments on screening of individual use cases, for example to explain reasons for failing particular screens or to provide supplementary information. Screening results and comments are available to view and download in the Use Case Assessment Database.[32]

Step (c) Scoring. The use cases that passed screening were then "scored" on their relative benefits, costs, and ease/risk of implementation:

- Benefits were scored according to two parameters: (1) The estimated benefit in dollars per EV per year from VGI for the use case, and (2) the estimated aggregate number of vehicles ("population") that could participate in that VGI use case by 2022.[33] Participants conducting the scoring were asked to rate a given use case using five pre-defined ranges for each parameter, see Annex 4 for the specific ranges. The assessed total benefit score for each use case ($/year as a state-wide aggregate) was the product of these two parameters.[34] Note that the population dimension for benefits reflects technical potential of the total vehicles with technical capability to participate in VGI programs or incentives, not the actual number of vehicles that would be participating, which also requires considering factors like customer education, marketing effectiveness, and adoption rates, factors the Working Group was not able to consider.

- Costs were scored on a relative scale of 1-5 for "very high" to "very low" costs. During the scoring step, there was considerable discussion of the availability of cost data and the need to score costs on a relative rather than an absolute basis in the absence of cost data.[35] The Working Group decided to employ relative cost scoring because absolute costs for various use cases were difficult to obtain given time and confidentiality constraints – some of the private-sector participants said they were unable to share cost information for a number of reasons, including anti-trust and competitiveness concerns. This also meant that the Working Group could not make true cost-benefit comparisons for the use cases because costs were only scored on a relative basis. A number of policy recommendations in Section B support further work on cost data and cost-benefit comparisons.

[31] Note that some of the use cases that passed screening were designated as "disputed passes" by the Working Group. This meant one participant or scoring team deemed the use case to pass, and at least one other participant or scoring team deemed it to fail. See the "Stage 1 Report" linked in Annex 1 for details.
[32] See Footnote 30.
[33] The scoring of benefits of each use case was based on either customer benefits for customer applications, or system benefits for system applications. System benefits include benefits to ratepayers, and could account, for example, for avoided power system upgrade costs, as well as potential downward pressure on electricity rates to the benefit of all customers as through the acceleration of EV adoption and resulting increase in electricity sales. The factors taken into account by participants in scoring use cases were partially but not fully documented in their comments on scoring, which are available online (see Annex 1 for links to Working Group materials).
[34] Total benefit score was the logarithm of the average $/vehicle/year score for a given use case times the average population for the use case. Total benefit scores of the 320 scored use cases ranged from 4.8 to 8.3.
[35] See in particular the document "IOU Perspective on VGI Use-case Benefits and Costs" linked in Annex 1.

- Ease/risk of implementation was similarly scored on a relative scale of 1-5, from "very difficult and risky" to "very easy and not risky." A low score for ease/risk of implementation was also intended to point to significant barriers that should garner policy-maker attention.

- In total, 320 use cases out of the 355 use cases that passed screening were scored with at least a partial benefit score.[36] There were also 660 individual text comments submitted with the numerical scoring. For example, some comments on the scoring pointed to why specific use cases received a high or low score for ease/risk of implementation. Scoring results and comments are available to view and download in the Use Case Assessment Database.[37]

Step (d) Ranking. The Working Group did not agree upon one specific ranking of the 320 use cases as to which would provide higher or lower value. However, participants also recognized that policy-making would be difficult if all 320 use cases were left undifferentiated, so the Working Group defined several "subsets" of use cases that might be considered "higher value" or "high scoring" or "priorities" or "favorable." All of these subsets were assessed by the Working Group as having merit and useful for further work.

Results of Use Case Scoring

Figure 1 shows the distribution of benefit scores across all 240 LDV use cases. The figure shows both benefit metrics side-by-side for each use case – the scored "$/EV/year" metric (with use cases sorted from low to high) and the associated scored "EV Population" metric for each use case, for the population of EVs that could participate in that use case by 2022.[38]

The total benefit of a given use case is the product of these two benefit metrics. Figure 1 shows that many use cases with low $/EV/year scores have high population scores, so that the total benefit for these use cases can still be high. Conversely, many use cases with high $/EV/year benefit scores have low population scores, so the total benefit may be low.

It should also be noted that some use cases shown in Figure 1 may have higher benefits than shown by the maximum axis value of $800/EV/year; see "Scoring the Benefit Metric $/EV/year" on the next page.

[36] "Partial benefit score" means either a $/EV/year score or an EV Population score. The total of 320 scored use cases does not include a number of technology and vehicle-type variants of the same use case, see Annex 4 for details on the MHDV technology variants. There were 5 LDV technology variants and 83 MHDV technology variants also scored; these technology variants are included in the listing in Annex 5 and listed separately in the Use Case Assessment Database. In total in the database there are 437 use cases and technology variants of those use cases that passed screening.

[37] See Footnote 30.

[38] The data used in Figure 1 comes solely from the estimates made by Working Group participants in their scoring of the use cases (see Annex 4). Figure 1 does not reflect directly upon any external studies or analysis, although participants may have used external sources in making estimates, and if so, they were asked to document this in scoring comments.

Scoring the Benefit Metric $/EV/year

The benefit metric $/EV/year was scored according to five multiple-choice options for LDV use cases: $1-50, $50-150, $150-300, $300-600, and $600-1000 (see Annex 4). Ranges for MHDV scoring were a factor of ten higher, so the highest MHDV range was $6,000-10,000. When calculating the average score for a given use case based on scores submitted by participants, the mid-point of these ranges was used. Thus, the highest average score possible is $800/EV/year for an LDV use case, given the multiple-choice options available to scorers. Six LDV V2G use cases received this highest average score of $800/EV/year, as reflected in Figure 1. If scorers wanted to score a use case higher than the highest option, they were instructed to so indicate in their scoring comments. Comments for at least three LDV V2G use cases indicated that the benefit should be scored as high as $3000/EV/year for those use cases. For MHDV scoring, eight V1G and five V2G use cases were scored with the highest option of $8,000/EV/year, and comments indicated that scores should be higher than $10,000/EV/year for some of those.

There are some use cases with both high $/EV/year scores and high population scores, and these result in high total scored benefits:

- The highest total scored benefit from a single LDV use case is $200 million/year from Use Case #1, residential single-family home V1G with indirect control of charging, for customer bill management.
- The second highest total scored benefit is $160 million/year from Use Case #4, residential single-family home V1G with direct control of charging, for customer bill management.
- The third highest total benefit, also $160 million, is from Use Case #827, for commercial workplace V2G with direct control of charging, for customer bill management. However, V2G use case #827 has a low average score for ease/risk of implementation.
- There are a further 15 use cases that also have a low average score for ease/risk of implementation but that have a high total benefit ranging from $10 million to $100 million. To the extent that policy could remove barriers that would improve the ease/risk of implementation, these use cases might be targeted by policy as unlocking high value.[39]
- There are a further two use cases with total benefit above $100 million and high scores for ease/risk of implementation, for rideshare vehicle charging in single-family homes and public destination.[40]

Figure 2 shows the distribution of total benefit in dollars per year across all use cases, which is the product of the $/EV/year metric and the population metric. As can be seen, total benefits from LDV use cases are in general significantly higher than benefits from MHDV use cases according to the scoring by Working Group participants, due in part to higher assessed EV populations for LDV in the short-term. The highest total benefit among MHDV use cases was $16 million/year, for small truck fleet charging with either direct or indirect control, for customer bill management (Use Cases #2245 and #2248).

[39] These 15 use cases are the V1G use cases 498, 906, 918, 1026, 1110, 1121, 1230, 1334, 1434, 1442; and the V2G use cases 115, 118, 1028, 1436, 1544.
[40] These two use cases are 205 and 1226.

Figure 1: Distribution of Average Benefit Scores for LDV Use Cases ($/EV/year and EV Population)

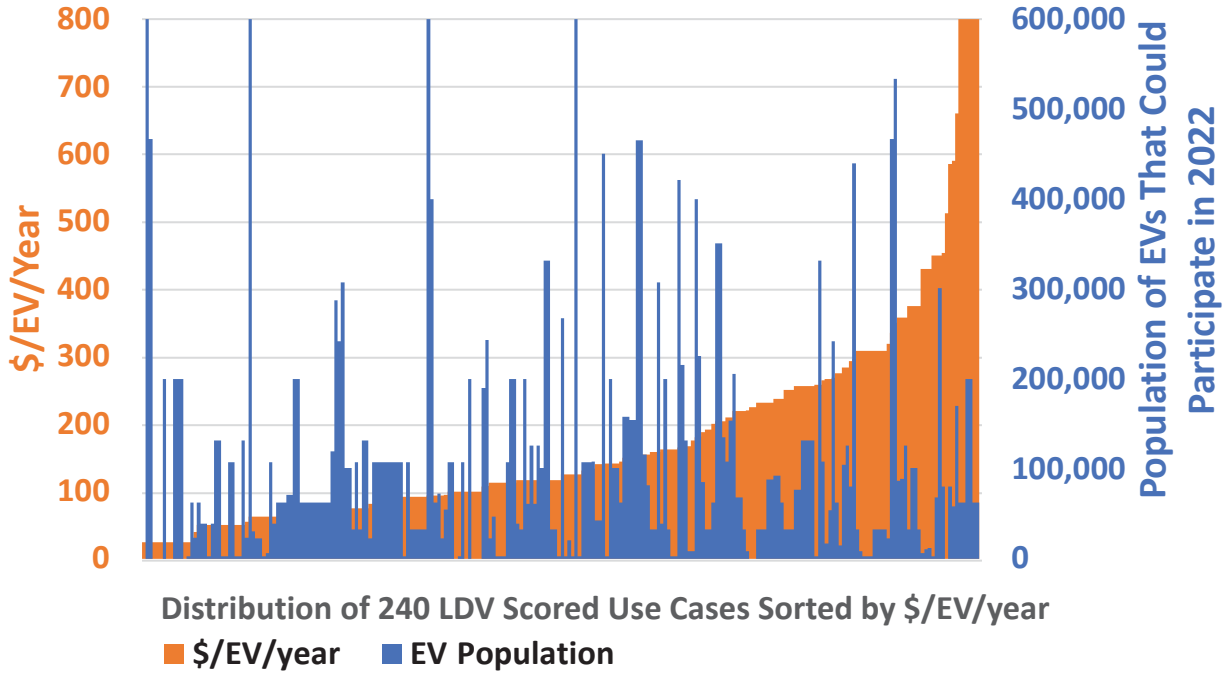


Figure 2: Distribution of Total State-Wide Benefit in 2022 as Scored Across All Use Cases ($/year)

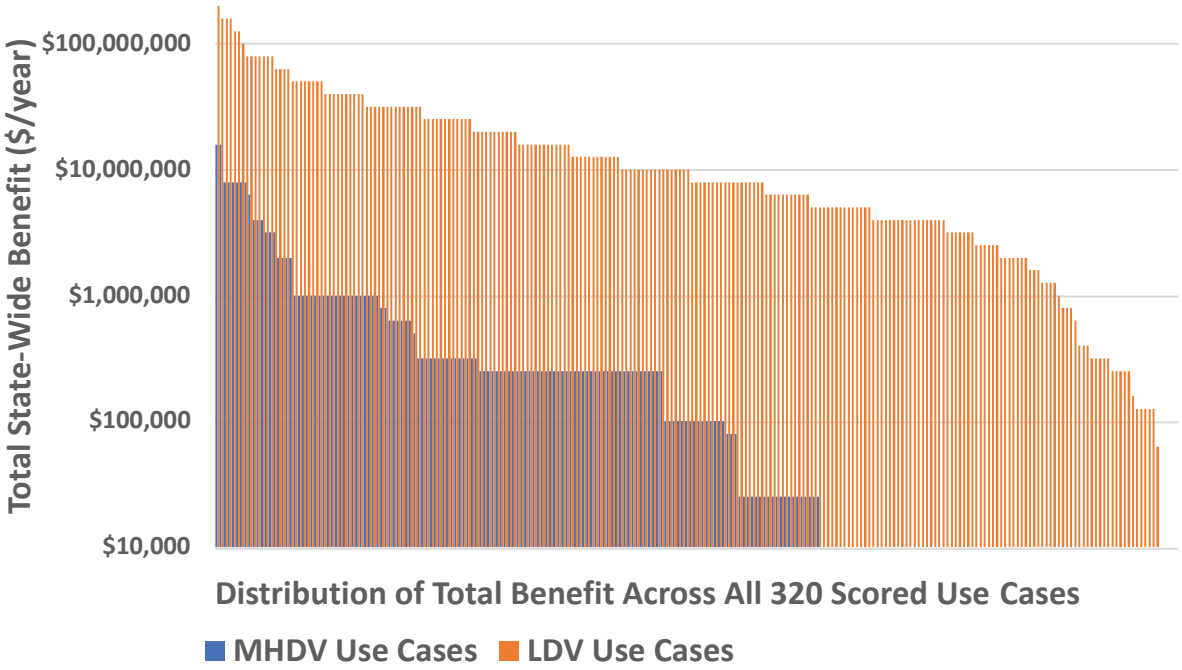


Figure 3: Distribution of Average Cost Scores

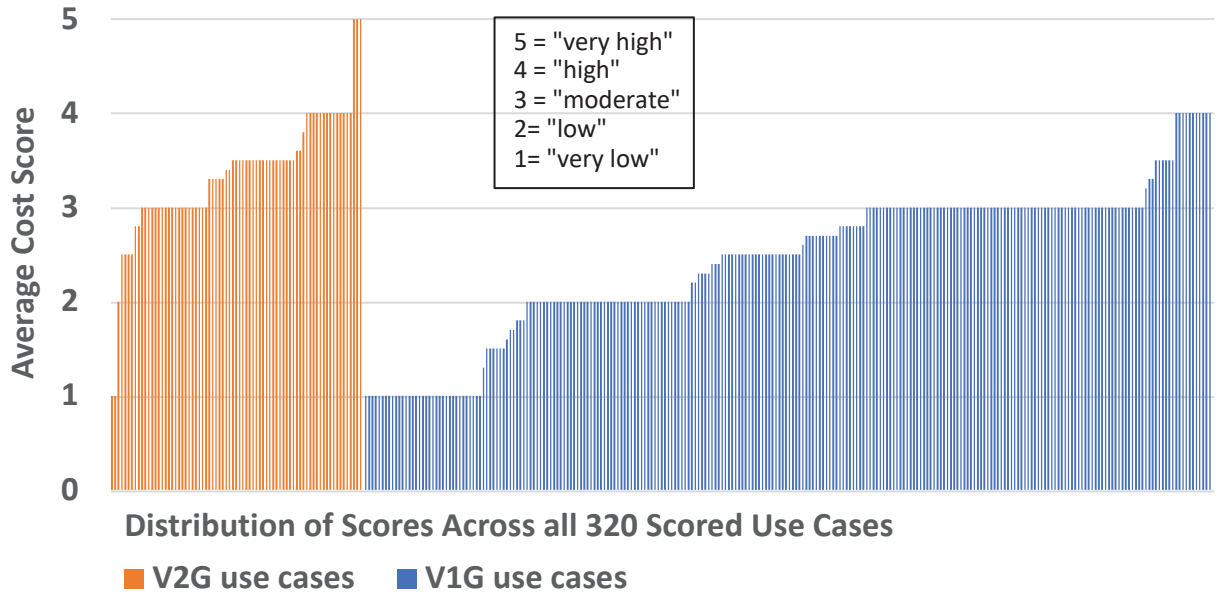
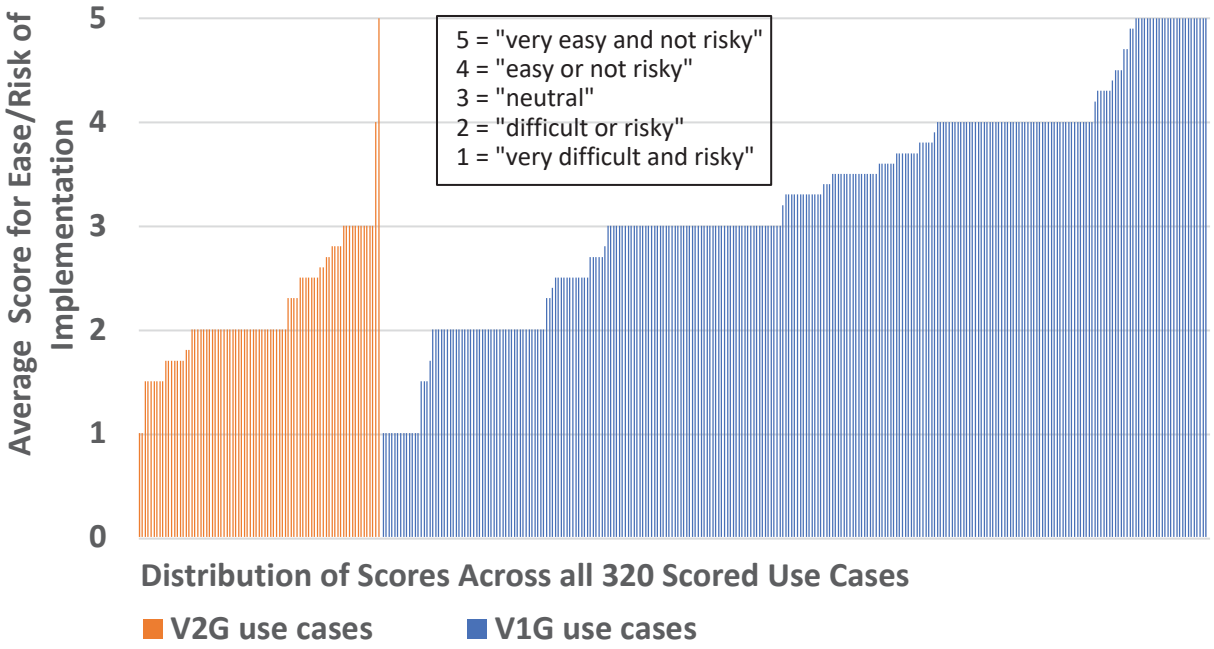


Figure 4: Distribution of Average Scores for Ease/Risk of Implementation



Working Group Answers to PUC Question (a)

The conclusion of the Working Group was that all use cases that passed screening and received at least a benefit score should, for the purposes of this report, be considered as "able to provide value now."[41] These 320 use cases are given in Annex 5. Most Working Group participants agreed that no scored use case should be excluded from being considered as "able to provide value now," since all use cases that passed screening and received a benefit score indicated at least some value.[42]

However, the value perceived by Working Group participants for these use cases varied widely on a broad spectrum, when benefits, costs, and the ease and riskiness of implementation (related to barriers and many other factors) are taken into account. For example, high-cost and low-benefit use cases should not be viewed the same as low-cost and high-benefit use cases. Therefore, it is clear that these 320 use cases should not all be treated equally in policy-making, but should be differentiated across a spectrum of value. Furthermore, many other use cases developed by the Working Group beyond these 320 use cases have the potential to provide value in the medium- and long-term.

Since the scoring of use case costs and the ease and risk of implementation was relative, meaning that costs could not be compared with benefits, the Working Group was unable to arrive at any quantitative assessment of "net value." Nevertheless, as noted above, during the ranking step of the use case assessment process, the Working Group solicited from participants and documented a number of suggested "subsets" of use cases that might be termed "higher value" or "high scoring" or "favorable," although no such terms were agreed upon by the Working Group. All of these subsets were assessed by at least some participants as having merit and useful for further work.

Highlighting or Ranking Use Case Value

Based on use case scoring, a number of "subsets" of smaller groups of use cases were developed by the Working Group for highlighting or ranking use case value, summarized below. These are provided as part of the Working Group's answer to PUC Question (a).

1. "Consensus use cases." Most Working Group participants agreed that priority sectors and applications for use cases providing value in the short-term include the following:[43]

- Residential sector broadly, for LDV use cases
- Commercial workplace sector broadly, for LDV use cases

[41] Use cases receiving at least a benefit score means that at least one participant scored the use case for benefits, either for the $/EV/year benefit metric, and/or for the metric total population of EVs that could participate by 2022. There was some debate about whether use cases scored on only one of these metrics be excluded, since the full benefit result of multiplying the two metrics together could not be obtained, most participants agreed to include the use case if only one of these metrics was scored.

[42] The conclusion that all use cases with benefits should, for the purposes of this report, be considered as "able provide value now" should only be interpreted as an answer to PUC Question (a), and does not imply that programs to enable these use cases necessarily maximize benefits and minimize costs.

[43] The Working Group agreed to call these "consensus use cases" even though a few participants were not in full agreement with this term or with every aspect of the subset definition. PUC Question (a) uses the word "now" and as noted previously, the Working Group interpreted "now" to mean the short-term through 2022.

- Customer bill management
- Distribution upgrade deferrals
- Home and building backup power (V2H and V2B)
- Commercial sector demand-charge management (customer bill management)
- V2G that can provide value now, including V2G use cases in the bullets above
- System applications easily implementable for vehicle locations with daytime charging ability
- Vehicle types with excess battery capacity relative to duty cycle, such as school buses
- All system and customer applications that defer charging away from peak periods

2. Honda value-metric subset. Honda defined a "value metric" that integrated all three metrics of benefits, costs, and ease/risk of implementation, as a simple way to rank the scored use cases considering all three metrics. This metric gives a means to focus on a set of high-value use cases for more in-depth analysis. The metric Honda developed was the simple multiplication of the benefit score times the cost score (inverted so lowest cost gives the highest score) times the score for ease/risk of implementation. This three-item product gives a single value that can be ranked. Honda also pointed to the text comments that participants made while scoring the use cases, and suggested that comments for the high-value use cases identified through this metric be examined in depth, as to commonalities, context, trends, and drivers for specific use cases based on existing policies and programs.

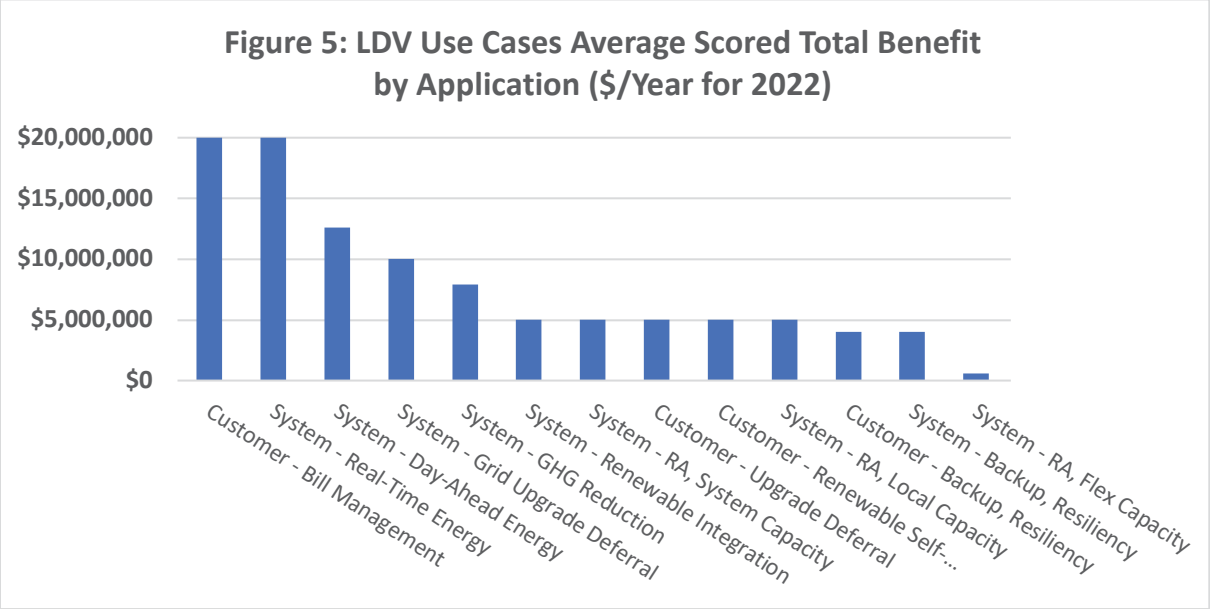
3. Ford high-value subset. Ford suggested filtering for high-value LDV use cases that provide at least $150 in value per EV per year, and that received a score for ease/risk of implementation of either "very easy and not risky" (score of 5 on scale of 1-5) or "easy or not risky" (score of 4). Ford suggested that after such filtering, each of the high-value use cases should be reviewed to brainstorm the policy and industry actions required to catalyze implementation and capture that value.

4. Gridworks above-median subset. This subset defines a use case as providing higher value if all three metrics for a given use case -- benefits, costs, and ease/risk of implementation -- were each scored above the median value of all use cases scored for that metric. Separate medians were employed for LDV vs. MHDV use cases. "Above median" is a standard method of distinguishing "high" from "low" in any groupings, and Gridworks as the Working Group facilitator applied this standard method to compare against the other subsets.

5. Karim Farhat Prime Flex subset. This subset defines a fully scored use case as "favorable" if at least one party deemed it as such. By design, the methodology did not rely on scoring averages, in order to be as inclusive as possible. The threshold for defining a use case as "favorable" is: a minimum total state-wide benefit of at least $100,000 per year from the estimated EV population that could participate by 2022; a cost score of "low" or "very low"; and an ease/risk of implementation score of either "very easy and not risky" or "easy or not risky" (for further details see material linked in Annex 1).

6. Nissan analysis by application and sector. Nissan analyzed average benefit scores by application, to organize the screening results of the 17 defined use case applications with the highest benefit scores. See the Nissan document linked in Annex 1 for details. The highest LDV scores were for customer bill management, system real-time energy, system day-ahead energy, and system grid upgrade deferral applications. The highest MHDV scores were for customer bill management, customer renewable self-consumption, system RA (system capacity), system day-ahead energy, and customer backup/resiliency applications. Nissan also analyzed average benefit scores by sector. The highest scoring sectors were residential single-family home, residential single-family-home rideshare, commercial public commute, and commercial workplace.

Figure 5 shows the Nissan analysis applied to LDV use cases by application. The "average scored benefit" is the product of the $/vehicle/year benefit metric and the "population" benefit metric for each use case, and then averaged across all use cases for that application. The "population" benefit metric for each use case is the scored level of EV population for that use case that could technically participate in VGI programs by 2022, not considering program participation levels (see description of scoring above).



Any one of the subsets defined above could be chosen and analyzed, in terms of value of the use cases and detailed understanding of benefits, costs, and ease/risk of implementation. The text comments provided with scoring submissions provide a further pool of insight on the use cases within these subsets. Designations of which use cases fall into which subsets are contained in the Use Case Assessment Database.[44]

Insights from Use Case Subsets

There are 29 LDV use cases that simultaneously appear in all of the defined subsets above. This means these use cases are scored highly in a robust manner—they score highly across a number of different metrics simultaneously. All of these use cases are V1G, as no V2G use cases were highly scored enough to appear in all subsets. This is generally because, while many V2G use cases were scored highly for total benefits, they were often scored as having higher costs and less ease or higher risk of implementation. Figures 6 and 7 show the sectors and applications associated with these 29 use cases.[45]

[44] See Footnote 30. All use case material is also available as a series of Excel files linked in Annex 1.
[45] Rideshare vehicle charging in Figure 6 is distributed across a number of different residential and commercial sectors.

Figure 6: Sectors of LDV Use Cases Appearing in All Subsets

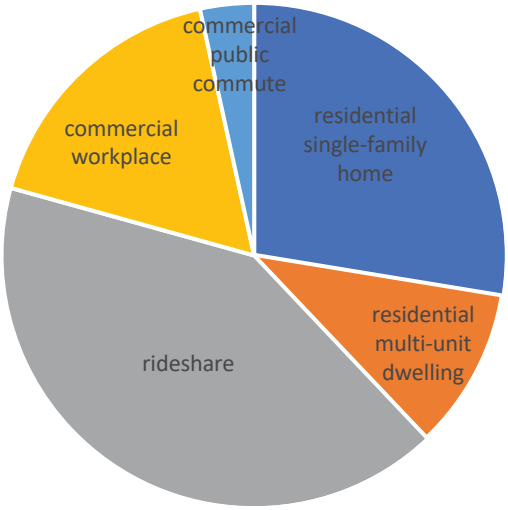
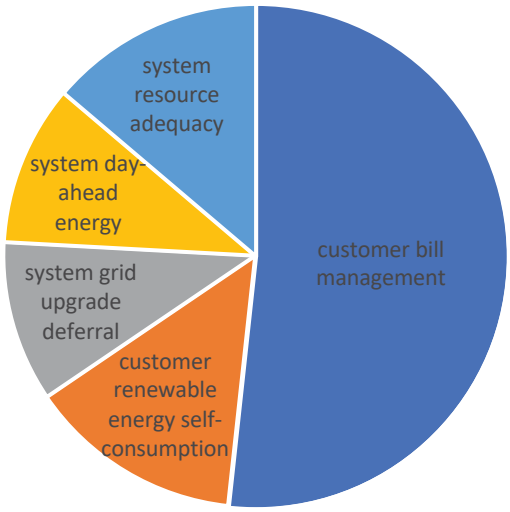


Figure 7: Applications of LDV Use Cases Appearing in All Subsets



Insight from a Particular Subset and Definition of Value

To illustrate the insight that can be gained from looking through the lens of a particular subset using a particular definition of value, Tables 3 and 4 show the top-25 ranked LDV and MHDV use cases according to the Honda value metric. Again, all are V1G use cases for reasons noted above. It can be seen that:

- The majority of LDV use cases are for residential single-family homes, with five use cases for commercial workplace, four use cases for residential multi-unit dwellings, and three use cases for commercial public commute (i.e., public parking).
- The majority of MHDV use cases are for small trucks, with an additional four use cases for large trucks, six use cases for transit buses, and two use cases for school buses.
- LDV customer applications are for bill management and grid upgrade deferral across all sectors, and for renewable self-consumption in both residential and commercial workplace use cases.
- Customer bill management is the main application for large and small trucks and school buses.
- Small truck use cases provide the greatest number of different applications -- customer bill management, customer renewable energy self-consumption, system renewable energy integration, system day-ahead energy, and system GHG reduction.
- There are six rideshare vehicle charging use cases, for charging both in residential single-family homes and multi-unit dwellings, and for the commercial public commute sector (i.e., charging in public parking).
- Commercial workplace bill management and renewable self-consumption are both unified and fragmented, meaning scoring deemed both options to be high-value – charging infrastructure operated by the workplace entity, and charging operated by a third party or aggregator.

Table 3. Top-25 Ranked LDV Use Cases According to Honda Value-Metric

ID	Sector**	Application	Approach	Resource*
1	Residential - Single Family Home	Customer - Bill Management	Indirect	Unified
13	Residential - Single Family Home	Customer - Upgrade Deferral	Indirect	Unified
16	Residential - Single Family Home	Customer - Upgrade Deferral	Direct	Unified
37	Residential - Single Family Home	Customer-Renewable Self-Consumption	Indirect	Unified
49	Residential - Single Family Home	System - Grid Upgrade Deferral	Indirect	Unified
109	Residential - Single Family Home	System - Renewable Integration	Indirect	Unified
121	Residential - Single Family Home	System - GHG Reduction	Indirect	Unified
133	Residential - Single Family Home	System - RA, System Capacity	Indirect	Unified
148	Residential - Single Family Home	System - RA, Flex Capacity	Direct	Unified
160	Residential - Single Family Home	System - RA, Local Capacity	Direct	Unified
205	Residential - Single Family Home, Rideshare	Customer - Bill Management	Indirect	Unified
241	Residential - Single Family Home, Rideshare	Customer-Renewable Self-Consumption	Indirect	Unified
313	Residential - Single Family Home, Rideshare	System - Renewable Integration	Indirect	Unified
337	Residential - Single Family Home, Rideshare	System - RA, System Capacity	Indirect	Unified
410	Residential - Multi-Unit Dwelling	Customer - Bill Management	Indirect	Fragmented
458	Residential - Multi-Unit Dwelling	System - Grid Upgrade Deferral	Indirect	Fragmented
518	Residential - Multi-Unit Dwelling	System - Renewable Integration	Indirect	Fragmented
614	Residential - Multi-Unit Dwelling, Rideshare	Customer - Bill Management	Indirect	Fragmented
817	Commercial - Workplace	Customer - Bill Management	Indirect	Unified
818	Commercial - Workplace	Customer - Bill Management	Indirect	Fragmented
830	Commercial - Workplace	Customer - Upgrade Deferral	Indirect	Fragmented
853	Commercial - Workplace	Customer-Renewable Self-Consumption	Indirect	Unified
854	Commercial - Workplace	Customer-Renewable Self-Consumption	Indirect	Fragmented
866	Commercial - Workplace	System - Grid Upgrade Deferral	Indirect	Fragmented
1753	Commercial - Public Commute, Rideshare	System - GHG Reduction	Indirect	Unified
1430	Commercial - Public Commute	Customer - Bill Management	Indirect	Fragmented
1514	Commercial - Public Commute	System - Day-Ahead Energy	Indirect	Fragmented

(*) Resource is “aligned” for all entries

Table 4. Top-25 Ranked MHDV Use Cases According to Honda Value-Metric

ID	Sector	Application	Type	Resource*	Vehicle Type**
1837.2	Commercial-Fleet, Transit Bus	Customer - Bill Management	Indirect	Unified	LR Transit Bus A
1837.3	Commercial-Fleet, Transit Bus	Customer - Bill Management	Indirect	Unified	LR Transit Bus B
1838.2	Commercial-Fleet, Transit Bus	Customer - Bill Management	Indirect	Fragmented	LR Transit Bus A
1921.2	Commercial-Fleet, Transit Bus	System - Day-Ahead Energy	Indirect	Unified	LR Transit Bus A
1921.3	Commercial-Fleet, Transit Bus	System - Day-Ahead Energy	Indirect	Unified	SR Transit Bus B
1969.2	Commercial-Fleet, Transit Bus	System - RA, System Capacity	Indirect	Unified	LR Transit Bus A
2041	Commercial-Fleet, School Bus	Customer - Bill Management	Indirect	Unified	
2042	Commercial-Fleet, School Bus	Customer - Bill Management	Indirect	Fragmented	
2245	Commercial-Fleet, Small Truck	Customer - Bill Management	Indirect	Unified	
2245.1	Commercial-Fleet, Small Truck	Customer - Bill Management	Indirect	Unified	Small Truck B
2246	Commercial-Fleet, Small Truck	Customer - Bill Management	Indirect	Fragmented	
2246.1	Commercial-Fleet, Small Truck	Customer - Bill Management	Indirect	Fragmented	Small Truck B
2248.1	Commercial-Fleet, Small Truck	Customer - Bill Management	Direct	Unified	Small Truck B
2281	Commercial-Fleet, Small Truck	Customer-RE Self-Consumption	Indirect	Unified	Small Truck B
2284	Commercial-Fleet, Small Truck	Customer-RE Self-Consumption	Direct	Unified	Small Truck B
2329.1	Commercial-Fleet, Small Truck	System - Day-Ahead Energy	Indirect	Unified	Small Truck B
2353	Commercial-Fleet, Small Truck	System - Renewable Integration	Indirect	Unified	Small Truck B
2354	Commercial-Fleet, Small Truck	System - Renewable Integration	Indirect	Fragmented	Small Truck B
2356	Commercial-Fleet, Small Truck	System - Renewable Integration	Direct	Unified	Small Truck B
2365	Commercial-Fleet, Small Truck	System - GHG Reduction	Indirect	Unified	Small Truck B
2368	Commercial-Fleet, Small Truck	System - GHG Reduction	Direct	Unified	Small Truck B
2449.1	Commercial-Fleet, Large Truck	Customer - Bill Management	Indirect	Unified	Large Truck A
2450.1	Commercial-Fleet, Large Truck	Customer - Bill Management	Indirect	Fragmented	Large Truck A
2452.1	Commercial-Fleet, Large Truck	Customer - Bill Management	Direct	Unified	Large Truck A
2458.1	Commercial-Fleet, Large Truck	Customer - Bill Management	Direct	Unified	Large Truck A

(*) Resource is “aligned” for all entries. (**) For details on vehicle types, see Annex 3. LR = long range, SR = short range.

V2G Use Cases

There are 80 V2G use cases among the 320 scored use cases. Figures 8 and 9 show the distribution of sectors and applications for these V2G use cases. As stated previously, many of these V2G use cases are scored highly for benefits, but most are scored as having higher costs and/or less ease or higher risk of implementation, thus they do not appear in the defined subsets. Among these 80 V2G use cases are 7 that appear in at least one of the subsets, for residential single-family homes and commercial workplaces and for backup/resiliency, bill management, and renewable self-consumption (Table 5).

Figure 8: Sectors of All V2G Use Cases

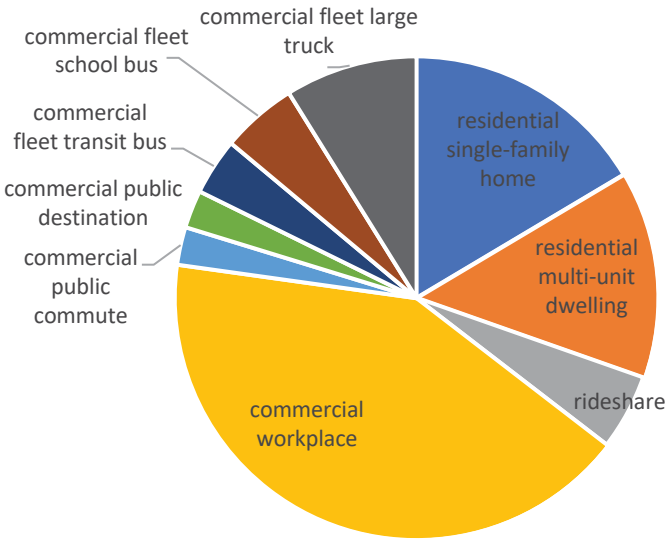


Figure 9: Applications of All V2G Use Cases

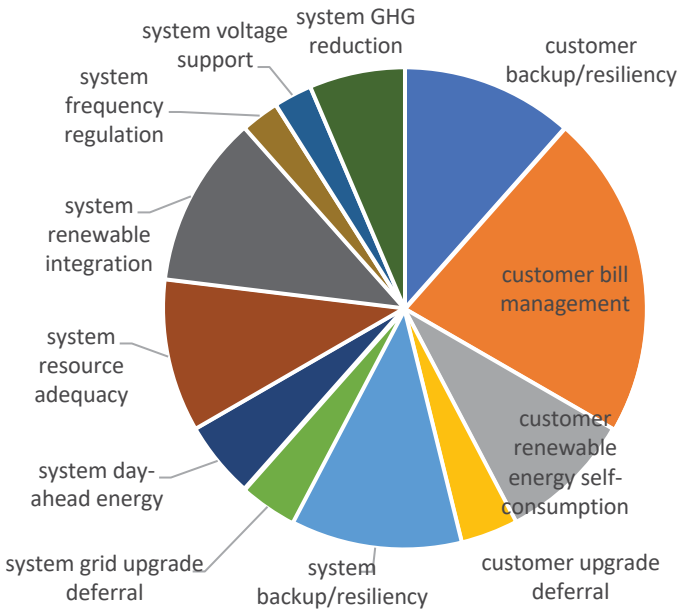


Table 5. V2G Use Cases Appearing in High-Scoring Subsets

ID	Sector	Application	Type	Resource*
31	Residential - Single Family Home	Customer - Backup, Resiliency	Indirect	Unified
34	Residential - Single Family Home	Customer - Backup, Resiliency	Direct	Unified
826	Commercial - Workplace	Customer - Bill Management	Direct	Unified
850	Commercial - Workplace	Customer - Backup, Resiliency	Direct	Unified
860	Commercial - Workplace	Customer-Renewable Self-Consumption	Indirect	Fragmented
872	Commercial - Workplace	System - Grid Upgrade Deferral	Indirect	Fragmented
2458	Commercial - Fleet, Large Truck (class 6-8)	Customer - Bill Management	Direct	Unified

(*) Resource is “aligned” for all entries

Towards Further Development of Use Case Understanding

The summaries and insights provided in this section are but a slice of the total insights possible–the Working Group generated a wealth of information on over 1,000 VGI use cases. The use cases that were screened out from this initial set of 1,000 could still provide value in the future, and text comments on screening and further documented screening insights generated by the screening teams can help further distinguish high-value use cases beyond the short-term (see Annex 1 for links to all this material). Of the 320 use cases that received scores for benefits, costs, and/or ease/risk of implementation, many can be ranked or prioritized in different ways to give particular perspectives on value, also considering the 660 individual comments generated by participants while scoring use cases.

As noted above, there are many use cases with low $/EV/year benefit scores but high population scores, so that the total benefit for these use cases can still be high. And conversely, many use cases with high $/EV/year benefit scores have low population scores, so the total benefit may be low. There are also use cases with both high $/EV/year scores and high population scores, and these result in highly scored total statewide benefits. The highest total benefit from a single LDV use case is $200 million/year, and from an MHDV use case is $16 million/year.

The good news is that there are many potential VGI use cases which can provide value. And the potential market for VGI is diverse, complex and interwoven across a broad swath of the power and transportation sectors. Given the use case assessment work performed by the Working Group, it appears that the work of developing VGI markets will demand persistent experimentation for the next several years, rather than simple broad, sweeping strokes that can happen quickly. Importantly, leaders from both the demand and supply sides of the nascent VGI market agree California should take an inclusive approach to potential VGI opportunities.

SECTION B. PUC QUESTION (B) WHAT POLICIES NEED TO BE CHANGED OR ADOPTED TO ALLOW ADDITIONAL USE CASES TO BE DEPLOYED IN THE FUTURE?

The Working Group developed a set of 92 individual recommendations for policy actions that California state agencies, utilities, CCAs, other LSEs, and the California ISO could undertake to advance VGI in the short-, medium-, and long-term.[46] The full text of all 92 recommendations is given in Annex 6. These recommendations are separated into 11 different policy categories (Table 6).

Table 6. Policy Categories

#	Category
1	Reform retail rates
2	Develop and fund government and LSE customer programs, incentives, and DER procurements
3	Design wholesale market rules and access
4	Understand and transform VGI markets by funding and launching data programs, studies and task forces
5	Accelerate use of EVs for bi-directional non-grid-export power and PSPS resiliency and backup
6	Develop EV bi-directional grid-export power including interconnection rules
7	Fund and launch demonstrations and other activities to accelerate and validate commercialization
8	Develop, approve, and support adoption of technical standards not related to interconnection
9	Fund and launch market education & coordination
10	Enhance coordination and consistency between agencies and state goals
11	Conduct other non-VGI-specific programs and activities to increase EV adoption

Together, these categories address virtually all aspects of policy support for the VGI use cases providing value in the short-term, as well as many use cases which could potentially provide value in the medium- and long-term:

- Category 1, reforming retail rates, can support both “indirect” use cases, for which charging decisions can be based on time-varying price signals (such as TOU rates), and “direct” use cases where new rates can improve cost-effectiveness or provide new incentives for managed charging.
- Category 2, public and ratepayer funds for government and LSE customer programs, incentives, and procurements can support scale-up and cost reduction of already-commercial VGI solutions for most V1G use cases, as well as already-commercial V2G use cases.
- Category 3, recommendations addressing wholesale market rules and access can support use cases for system applications, including a wide variety of grid services, from day-ahead and real-time energy to resource adequacy, renewable energy integration, and grid upgrade deferrals.
- Category 4, further information on customer engagement, costs, benefits, and scale, can support market-based knowledge and information for reducing costs and removing barriers of use cases that may be under-employed currently but promise high value if market barriers are removed.

[46] All details and information about the policy recommendations are contained in the Policy Recommendations Database, available online at https://airtable.com/shr9JBvC2bAofuJpj. Database tables can be viewed and downloaded from that link and Excel versions are also available directly via the links in Annex 1.

- Category 5, on power generation not exported to the grid, can support behind-the-meter V2B and V2H use cases for customer backup and resiliency, including resiliency to counteract Public Safety Power Shutoffs (PSPS).
- Category 6, on power generation exported to the grid, can support grid-facing V2G use cases, such as system renewable energy integration, system resource adequacy, and system ancillary services like frequency regulation.
- Category 7, on public funding of demonstrations and commercialization activities, can support enhanced knowledge and market development for VGI solutions that are in the process of being fully commercialized.
- Categories 8-11 can support a wide variety of other programs and activities that can contribute to market development, technical standards, and coordination to address VGI in an integrated manner across state agencies.

Policy Recommendations Classification (Degree of Agreement) Based on Survey Results

To gain further insight into the policy recommendations and to classify the recommendations by degree of agreement from participants, the Working Group conducted a survey of participants and asked them four questions about each of the 92 recommendations (see Annex 2 for survey details):[47]

Policy Survey Questions

1. Do you agree or disagree that this recommendation will advance VGI in California?
2. How clear, understandable, and policy ready is this recommendation?
3. How critical and relevant is this policy to meeting your organization's own VGI objectives?
4. Any other comments on this recommendation?

The possible responses to Question #1 on whether respondents agree with a given recommendation were “strongly agree”, “agree”, “neutral”, “disagree”, and “strongly disagree.” The Working Group utilized these responses to classify the policy recommendations into “strongest agreement,” “good agreement,” “majority neutral,” and “majority disagree.”[48] Table 7 gives the criteria for all classifications and the number of recommendations so classified. Medium- and long-term recommendations were put into a separate classification to allow a sharper focus on the short-term, given the large number of short-term recommendations.

Tables 8-13 in the following sub-sections list the policy recommendations within each of these classifications. The divergence or convergence of survey responses, that is, the degree to which

[47] This survey was conducted on an expedited basis and not all policy recommendations were clear at the time. Survey responses remain anonymous and do not constitute formal institutional comment on policy proposals.
[48] The Working Group did not use the results of Questions #2 or #3 in assessing recommendations, but full survey results are available for further analysis; see Annex 1 for links to this material. Annex 8 lists the roughly 1200 comments received in response to Question #4 and Annex 9 shows graphically the scores for Questions #1 to #3.

respondents agreed with each other in rating a policy, is also noted in the following sub-sections, as either "strong convergence," "broad convergence," or "divergence of responses."[49]

Table 7. Classification of Policy Recommendations

Count	Classification	Criteria for Classification
23	Strongest agreement	Agree or strongly agree > 66% and strongly disagree < 20%
15	Good agreement	Agreement > disagreement and agreement > neutral
16	Majority neutral	Neutral > 50% [50]
7	Majority disagree	Disagreement > 50%
16	Policy action already underway	CPUC Energy Division staff comments so indicates
15	Medium-term and long-term	Policy recommendation timeframe so indicates
92	Total	

It must be noted that the classification for about one-fifth of the policy recommendations in this section may be less valid than for the others because the recommendations were re-worded by the original submitters after the survey was taken. Survey results on these re-worded recommendations may not as accurately reflect agreement with the current wording compared to recommendations whose wording remained unchanged. There was no time to re-conduct the survey and the Working Group, as it was concluding, believed it was in the best interest of clear policy-making to allow the re-wording. [51]

Digging Deeper: Participant Comments on Policy Recommendations from the Survey

There were over 1200 detailed comments on the policy recommendations, provided by 28 respondents in response to a survey of the whole Working Group. Annex 8 provides all of the survey comments. In addition, comments by some participants on recommendations made after the survey are also available as part of the Working Group materials; see Annex 1. ***Together all of these comments provide a wealth of further insight into the recommendations and can be utilized by agency staff and others to help further understand and consider policy actions.***

[49] For purposes of this section, "strong convergence" was defined as a mathematical standard deviation of less than 0.6 across all Question #1 survey responses to a given policy recommendation, "broad convergence" was defined as standard deviation between 0.6 and 1.0, and "divergence of responses" as greater than 1.0.

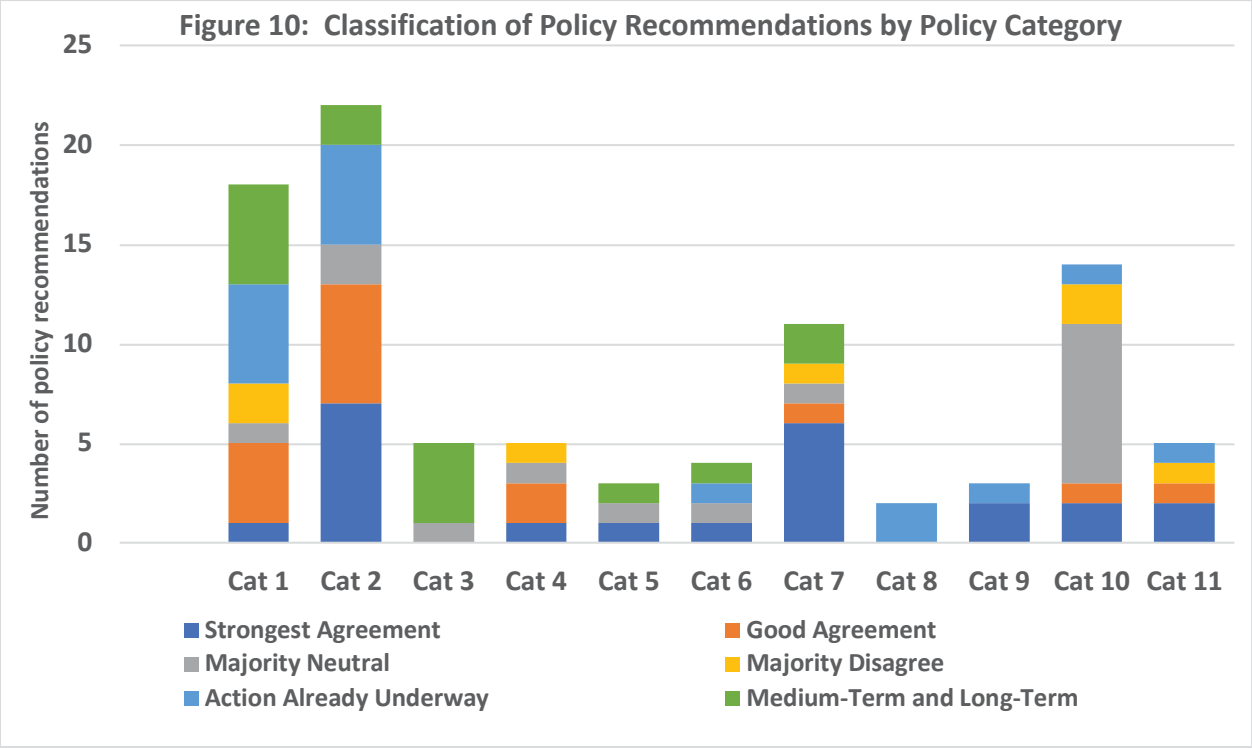
[50] "Majority neutral" also includes five cases where neutral is not an absolute majority, but rather total neutral responses are both greater than total disagreement response and greater than total agreement responses (1.06, 1.17, 3.01, 4.04, 7.01). These cases are noted in the text as also having a higher divergence of responses.

[51] There were 19 recommendations re-worded by the original submitters after the survey was taken: 1.10, 1.12, 1.16, 1.17, 2.02, 2.12, 2.16, 2.19, 2.20, 2.23, 4.03, 4.06, 6.01, 7.09, 7.11, 10.01, 10.04, 10.05, and 10.09. Re-wording was done mainly for clarification, so the policy substance of new wordings may remain similar to original wordings. The original wording of these 19 recommendations, upon which the survey results were based, is provided for reference in the Policy Recommendations Database linked in Annex 1. Most participants deemed that it was better to serve the needs of state agencies by accepting the updated wording at the risk of invalidating some of the survey results, recognizing that there was no time to repeat the survey for these recommendations. The classification of the 19 re-worded recommendations in this section is based on survey results for the original wording at the time of the survey.

Policy Recommendations Classifications by Category

The number of policy recommendations within each policy category and the classification of those recommendations are shown in Figure 10. Some characteristics of each category:

- More than half of Category 1 recommendations point to retail rate actions already underway or that should be further considered for the medium- and long-term. Rate applications not already in progress would be medium-term to allow time for submission, public review, and implementation.
- Most Category 2 recommendations on programs, procurements, and incentives had strong or good agreement, with a number also related to action already underway.
- Three-quarters of Category 3 recommendations on wholesale markets relate to the medium-term.
- Recommendations in Category 4 on studies and data have mostly good to neutral agreement.
- Although both Category 5 (bidirectional non-export/V2B) and Category 9 (market education) had fewer recommendations than other categories, they also received some of the strongest agreement.
- Category 7 on demonstrations and pilots has the highest share of strongest-agreement recommendations of any category.
- All Category 8 recommendations on technical standards relate to policy action already underway.
- More than half of the recommendations in Category 10 on inter-agency coordination are classified as majority-neutral, meaning most survey respondents were neutral on the relevance of these recommendations for scaling VGI.
- Category 11 on other programs and activities had mostly strong or good agreement.



Short-Term Recommendations with Strongest Agreement

There are 23 short-term recommendations with the strongest agreement (Table 8).[52]

Table 8. Short-Term Policy Recommendations with Strongest Agreement

Rec #	Policy Recommendation
1.07	Create an "EV fleet" commercial rate that allows commercial and industrial customers to switch from a monthly demand charge to a more dynamic rate structure
2.01	Require utilities to broadcast signals to a DER marketplace of qualified vendors (curtailment and load)
2.02	V2G systems become eligible for some form of SGIP incentives
2.04	Enable customers to elect BTM load balancing option to avoid primary or secondary upgrades, either if residential R15/16 exemption goes away, or as an option for non-residential customers
2.08	Consider coordinated utility and CCA incentives for EVs, solar PV, inverters, battery storage, capacity, and EV charging infrastructure to support resilience efforts in communities impacted by PSPS events
2.12	Allow V1G and V2G to qualify for SGIP to level the playing field with incentives for other DERs, but V1G would get less incentive compared to V2G based on permanent load shift logic
2.15	Incentive(s) for construction projects with coincident grid interconnection and EV infrastructure upgrade
2.17	Enable customers, via Rules 15/16 or any new EV tariff, to employ load management technologies to avoid distribution upgrades, and focus capacity assessments on the Point of Common Coupling
4.06	Use EPIC, ratepayer, US DOE, and/or utility LCFS funds for an on-going, multi-year program to convene VGI data experts to study lessons learned, quantify VGI/DER net value, fund new data sources, and study other topics
5.02	Pilot funding for EV backup power to customers not on microgrids, including goals for pilots in 2021-2022; utilities to consider feasibility of EVs for emergency backup in PSPS plans and resiliency solutions
6.07	Pilot funding for EV backup power to customers not on microgrids, including state-wide goals for at least 100 EVs by 2021 and 500 EVs by 2022; utilities to consider the feasibility of EVs for emergency backup generation in PSPS plans and resiliency solutions
7.03	Focusing on resiliency and backup application in workplace and multi-unit dwellings, leverage EPIC funding to pilot use-cases to understand and reduce costs and to streamline ease of implementation
7.04	Create pilots to demonstrate V2G's ability to provide the same energy storage services as stationary systems and let V2G systems participate in pilots for stationary storage
7.05	Special programs and pilots for municipal fleets to pilot V2G as mobile resiliency
7.07	Demonstration to define the means to allow aggregators, EV network providers, and charge station operators to dynamically map the capacity and availability of EVSE resources, using open standards
7.09	Use EPIC, ratepayer, USDOE, and/or utility LCFS funds ($50M) in many competitively bid large-scale demonstrations of promising VGI use cases to provide data needed to scale up VGI efforts (e.g., validate consumer acceptance, incentive levels, security, net value, and communication pathways)
7.11	Study to understand the impact on the distribution grid and generation system from EVs based on over ten existing or planned mandates from CARB and AQMDs to meet California's 2045 carbon neutral goal
9.01	Optimize CALGreen codes for VGI and revise to require more PEV-ready parking spaces and expand to existing buildings.
9.02	Create public awareness and education programs and materials on V2G systems and how to get them. This could particularly be focused toward government fleets
10.04	State agencies coordinate and maintain consistency on TE and VGI across the different policy forums with no duplication of regulation, clear roles and vision on VGI and priority on state TE goals over VGI
10.09	Incentivize use of multiple open standards for VGI communication, charging networks, cloud aggregators, and site hosts
11.03	Streamline permitting for charging infrastructure
11.05	Create Incentives for charging infrastructure for new public parking lot construction projects

[52] Tables 8-13 contain shortened text versions of the "policy action" associated with each policy recommendation. The full-text versions of all 92 policy recommendations, providing the full scope of the recommendation, along with a list of the extensive additional information available for each policy recommendation, are given in Annex 6.

Of these 23 short-term recommendations with strongest agreement, virtually all had broad "convergence" among all policy survey respondents. Such convergence means that all respondents agreed with each other – that there was a high degree of consistency among the responses. Recommendations 2.08 on coordinated incentives, 7.05 on municipal fleet pilots, and 9.02 on public awareness had particularly strong convergence. The exceptions to this pattern were 2.12 on V1G and V2G qualifying for SGIP and 7.11 on grid impact studies, which had weaker convergence than the others. For 2.12, four respondents strongly disagreed with the recommendation. Policy makers and any future working groups should examine the recommendations and comments to better understand the sources of the divergence.

While there was strong agreement for all of these recommendations, survey comments also pointed to considerations and questions that might need to be addressed, for example:

- Some policies might be considered medium-term rather than short-term, such as 2.01 on signaling a DER marketplace, 2.02 on SGIP incentives, 6.07 on pilots for microgrid-related solutions, and 7.07 on mapping EVSE resources.
- One comment also questioned how 2.01 on signaling a DER marketplace differs from existing DR programs.
- Mapping of EVSE resources is already part of the job and business models of aggregators (7.07).
- The perceived need for behind-the-meter load balancing varied widely (2.04)
- Some questioned whether it was appropriate to extend SGIP to VGI (2.02 and 2.12).
- Leveraging EPIC funding (7.03) will require collaboration between CPUC and CEC.
- Studies to understand grid impacts of TE are already underway (7.11).
- Open standards are possibly out-of-scope for the VGI Working Group to recommend (10.09).
- Public awareness (9.02) should be expanded beyond just V2G to also include V1G and the benefits of electrification in general, and should not be a stand-alone policy but part of a larger outreach, vehicle replacement and infrastructure planning effort.
- Permit streamlining (11.03) received the highest agreement level of all recommendations across all policy categories. However, some commenters were not clear about potential CPUC roles and what could be done. Energy Division staff noted that the Draft TEF (Section 10.3), identifies one possible answer—that utilities could potentially also provide training to support other types of PEV readiness activities beyond building code adoption and implementation, such as permit streamlining.

Policy Action for Medium- and Heavy-Duty Vehicles

The Working Group discussed what makes medium- and heavy-duty vehicles (MHDVs) distinct from light-duty vehicles (LDVs) in terms of VGI use cases and policy actions. While MHDV use cases were assessed distinctly from LDV use cases in answering PUC Question (a), some participants suggested that MHDVs are something of an "overlay" for policy rather than a distinct category of policy action. Policies for LDVs can also apply to MHDVs, including commercial rates, interconnection, and aggregation. However, the differences between MHDVs and LDVs also need to be understood by policy-makers, including a smaller number of customers with higher loads, rigid duty cycles, the special potential of school and commuter buses because of their duty cycle, clustering of large loads for MHDV charging, and the need to upgrade distribution system capacity to accommodate and accelerate MHDV charging. Some policy recommendations directly mention MHDVs, notably for programs related to school buses and transit vehicles. But most of the policy recommendations will apply to both LDVs and MHDVs.

Short-Term Recommendations with Good Agreement

There are 15 short-term recommendations with good agreement (Table 9).

Table 9. Short-Term Policy Recommendations with Good Agreement

Rec #	Policy Recommendation
1.01	Rate design for demand charge mitigation to be enabled by stationary battery storage coupled to EV charging
1.09	Allow customers with on-site solar and/or storage to utilize commercial EV rates
1.10	Improve Optional Residential and Commercial TOU rates designed to encourage EVs (e.g., whole house rate), fund outreach efforts on the rate, and set target to secure 60% level of participation
1.16	Expand the definition of eligible customer-generator under current NEM tariff option to include customers that own and/or operate EVs and/or EVSE with bi-directional capabilities
2.03	Establish "reverse EE" rebates (pay for performance?) for EVSE installations that build permanent midday load
2.13	Allow V1G (Smart Charging/Managed Charging) to be counted as storage for Storage Mandate
2.16	Encourage low-cost, multiple VGI communication control pathways and cloud aggregators and put to-be-determined VGI communication requirements on the cloud aggregators, not on the EVSE or EV
2.18	Incentivize multiple EVs using a single charging station in long-dwell AC charging locations to keep charging load spread across as many vehicles as possible
2.19	Create utility programs to site higher-level kW charging for commercial applications in the best locations to encourage high utilization using grid planning studies, routes, demographics & other tools
2.20	Consider funding opportunities and rate design reform for stationary batteries co-located with DCFC chargers
4.01	Establish a VGI Data Program to help gather, model, and analyze data related to VGI use-cases; prioritize the analysis of use-cases screened out by this Working Group due to data unavailability
4.03	Better understand the trend toward 10-19 kW home charging and explore long-term solutions to mitigate the impact (e.g. studies, pilots, task forces looking at incentives and disincentives)
7.06	Grant funding opportunities can be amended to provide "plus-up" funding for DER arrangements that optimize grid conditions
10.05	State agencies should recognize that stakeholder's specialized VGI staff resources are limited and avoid workshops and hearings on the same day, and hold no more than 2-3 VGI and TE events per month
11.04	Investigate ADA and other obstacles to charger installation at MUDs and some high-density C&I locations

Of these 15 short-term recommendations with good agreement, half had broad "convergence" among all policy survey respondents. Such convergence means that all respondents agreed with each other – that there was a high degree of consistency among the responses. The exceptions to this pattern were seven recommendations 2.03, 2.13, 2.18, 2.19, 4.01, 10.05, and 11.01, which had more pronounced divergence of responses. For some, a significant number of survey respondents disagreed with the recommendation, such as 8 respondents who disagreed with 2.03 on reverse energy efficiency rebates. Policy makers and any future working groups should examine the recommendations and comments to better understand the sources of the divergence.

Again, while there was good agreement for these recommendations, survey comments also pointed to considerations and questions that might need to be addressed, for example:

- Recent EV rate design changes have looked to reduce demand charges, which would reduce the potential benefit from stationary batteries for demand charge mitigation (1.01).
- Many details need to be worked out for 1.09 commercial rates for on-site solar.
- "Reverse EE" rebates (2.03) seems contrary to state mandates, may be better implemented as demand response or TOU, and may need better definition of relevance and market segments.
- Some comments questioned whether V1G can be considered "storage" (2.13).
- Need to clarify the eligibility of battery-backed DCFC for SGIP (2.20).
- Rules 15 and 16 should adequately address grid impacts of high-kW charging in residences, otherwise policy should accommodate and not stifle customer choice (4.03).
- ADA issues are unrelated to VGI and outside the scope of the Working Group (11.04).

Public Funds for VGI

Working Group participants noted that implementing policy recommendations in several of the policy categories will require public funds (i.e., budgetary funds, grants, or loans) and/or ratepayer funds (as approved in IOU rate cases). For recommendations in Category #2 "develop and fund government and LSE customer programs, incentives, and DER procurements," public funds and/or ratepayer funds are a primary source of funding, potentially along with private funds. These programs and procurements will typically be for commercially-mature or market-ready VGI solutions. Recommendations in Category #7, "fund and launch demonstrations and other activities to accelerate and validate commercialization," will likely also require public or ratepayer funds, and typically these funds are spent on solutions not yet commercialized or market-ready. Categories #4 and #9 may also require public and/or ratepayer funds, for data programs, studies, and analyses that can inform further decision-making and support market growth, and for market education and outreach.

Many participants believed that public funds should continue to support a wide range of VGI solutions and initiatives, including mature mass-market programs; innovative pilots and demonstrations; data programs, studies, and analyses; and education and outreach.

Short-Term Recommendations with Majority Neutral

There are 16 short-term recommendations with majority neutral (Table 10).

Table 10. Short-Term Policy Recommendations with Majority Neutral

Rec #	Policy Recommendation
1.06	The pricing signal received by the EV and that received by the EVSE should be aligned and consistent with one another and should incentivize and de-incentivize the same charging/discharging action
2.07	Create a strategic demand reduction performance incentive mechanism, include EVs as technology that can reduce and shift peak demand.
2.14	Prioritize, document and implement cost-effective use-case(s) for every transportation electrification plan, project, or program that is supported or subsidized by public funds, applied at commercial scale, and to be deployed within five years
3.01	Authorize new tariffs in CAISO ESDER Phase 4 that allow utilities to pay V1G aggregators to use managed charging to reduce the local distribution grid impacts of EV charging.
4.04	Perform detailed cost-effectiveness analysis for specific VGI use-cases in programs/measures that are ratepayer funded in order to quantify the impact on EV customers, ratepayers, utilities, and society
5.01	Bring automakers to the table to agree to allow limited discharge activity for resilience purposes to be kept under warranty if customers are willing to pay for upgraded bi-directional charging hardware.
6.03	Explicitly prioritize V2G use-cases for school buses with customer bill management to be included in the next cycle of PRP submissions by one or more LSEs, as well in the next phase of EPIC funding
7.01	Create pathways for TNC/rideshare drivers to reduce their costs by participating in utility programs and benefiting from make-ready infrastructure and charger rebates; by participating in state-funded programs like CALeVIP; and by securing direct access to utility rates when using public charging
10.02	Use the proposed Joint IOU VGI Valuation Framework (6 dimensions) and associated use-cases to reference, articulate, and communicate about VGI in policymaking across CA state agencies.
10.03	Public funding of VGI use-cases should prioritize initiatives, projects, and programs that involves formal collaboration between at least one LSE and at least one automaker or EV service provider.
10.06	Develop a Virtual Genset model and reference implementation pilot.
10.07	Avoid over-regulation of EVSE specifications
10.12	Establish a voluntary task force to convene on regular basis to discuss technological barriers, including potential recommendations related to interoperability, communication pathways, and protocols
10.13	Establish a voluntary task-force to convene on regular basis to discuss barriers related to retail market design, including potential recommendations
10.14	Establish a voluntary task-force to convene on regular basis to discuss barriers related to wholesale market design, including potential recommendations
10.15	Establish a voluntary task-force to convene on regular basis to discuss barriers impacting customer adoption and participation, including potential recommendation

Some examples of comments that point to the sources of such neutrality include:

- Many comments said the recommendation was not clear, more details are needed, it is not policy ready, and/or the problem addressed by the recommendation needs better definition: 1.06 on consistent price signals, 2.07 demand reduction performance incentives, 3.01 on CAISO ESDER tariffs, 6.03 on prioritizing use cases for PRP or EPIC, 7.01 on TNC/rideshare, 10.06 on a virtual genset model, and 10.07 on avoiding over-regulation of EVSE specifications
- Implementing cost effective use cases for every plan, project, or program (2.14) may not add value in every case, and requires coordination between many agencies
- Allowing limited discharge under warrantee (5.01) was seen as out of CPUC jurisdiction, the decision of individual automakers, and is not a clear-cut topic
- There were concerns about being too prescriptive for 10.02 on using the VGI Working Group use-case framework and 10.03 on prioritizing collaboration between LSEs and automakers

- Comments on 10.12, 10.13, 10.14, and 10.15 on volunteer task forces were mostly similar and supportive across all four recommendations, but many said this idea should be combined with other recommendations.

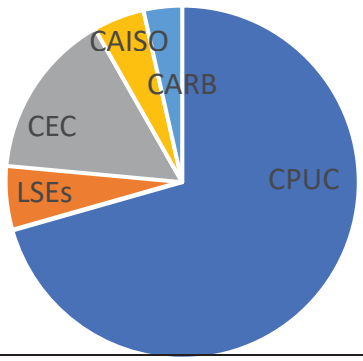
Of these 16 short-term recommendations with majority neutral, more than half had broad "convergence" among all policy survey respondents. Such convergence means that all respondents agreed with each other – that there was a high degree of consistency among the responses. The exceptions to this pattern were recommendations 1.06, 2.14, 3.01, 4.04, 5.01, 6.03, 7.01, which had more divergence of agreement than the others. Policymakers and any future working groups should examine the recommendations and comments to better understand the sources of the divergence.

Connecting the Dots: Lead and Supporting Agencies/Entities in Recommendations

Most of the 92 policy recommendations identify who the lead agencies/entities for implementing the recommendation would be, and some also identify agencies/entities in supporting roles.

- The CPUC is given as the lead agency in about two-thirds of the policy recommendations
- LSEs are given as the lead entities for five recommendations that all received strongest or good agreement: 1.15 on time-varying rates, 2.21 on performance-based incentives for building owners, 7.13 on quick approval of demonstrations, 9.03 on ME&O budgets, and 11.01 on demand charges for DCFC. Many other recommendations give LSEs supporting roles in carrying out programs and actions established or mandated by the CPUC or other organizations.
- The CEC is given as the lead agency for thirteen recommendations, relating to state-funded charging infrastructure, data and analysis, shared charging infrastructure, standards and requirements for buildings, EPIC funding, demonstrations and pilots, and public awareness and education programs. All but one (10.07 on over-regulation of specifications) received strongest or good agreement.
- CAISO is given as the lead entity for four recommendations: 3.01 on ESDER tariffs, 3.03 on real-time and ancillary markets, 3.04 on pathways for V2G participation in day-ahead and RA system services, and 3.05 on capacity-only system services. The last three are all medium-term recommendations with strongest or good agreement. CPUC is given as the supporting agency for three of the four recommendations, consistent with supporting the outcome where wholesale market rules are aligned with the highest-value opportunities for VGI.
- CARB is given as the lead agency for three recommendations: 2.24 on LCFS smarting charging, 7.02 on LCFS credits, and 11.02 on a shared benefit structure for LCFS.

Distribution of Lead agency/entity across all 92 recommendations



Short-Term Recommendations with Majority Disagreement

There are 7 short-term recommendations with majority disagreement (Table 11).

Table 11. Short-Term Policy Recommendations with Majority Disagreement

Rec #	Policy Recommendation
1.02	EV drivers across all sectors must be guaranteed direct access to their utilities' cost-competitive time-variant (e.g. TOU) rates; utilities must be allowed the option to own and/or operate at least a portion of the charging stations across all sectors so that their rates are directly available to EV drivers
1.05	Price signals received by EV customers should be relatively consistent (not necessarily identical) at a given time of day, across different sectors and price-setting entities; at the very least, different price-setting entities should agree on the time window where "off-peak" rates apply
4.02	Any Level 2 EVSE sold within the next two years should be capable of responding to external event or price signals, or user-defined criteria, and support OCPP, OpenADR, or IEEE 2030.5.
7.02	Improve the allocation of LCFS credits such that EVs with higher vehicle-miles earn higher credits, claiming credits is streamlined for EV drivers or their agents, and most credits are channeled back to driver/agent
10.10	A ML EVSE or charging station must be capable to provide energy services and may provide regulation services, and must support OCPP or an equivalent standard that supports an external energy management system for grid interactions
10.11	A HL Charging Station must provide energy services and must be capable of providing regulation services
11.02	Institute shared benefit structure for LCFS or similar funding between host site and EV driver/operator/owner

Some examples of comments that point to the sources of such disagreement include:

- Questions about whether utilities should own charging infrastructure and how that can be justified (1.02)
- Each LSE has its own cost recovery structure and there are limits to rate harmonization (1.05)
- Equipment requirements for EVSEs may seriously hinder the industry (4.02)
- It may be difficult for LCFS to cover EV drivers and may be difficult to administer (7.02)
- Concerns about relevance, technical standards, over-specification, and whether equipment and hardware specifications are in-scope for the Working Group, for both 10.10 and 10.11 on medium-level and high-level EVSE charging stations.
- Some said a shared benefit structure for LCFS is not really a VGI policy (11.02)

Of these recommendations, two had broad “convergence” among all policy survey respondents as to their common disagreement – 10.10 and 10.11. The other recommendations -- 1.02, 1.05, 4.02, 7.02, and 11.02 -- had high divergences of agreement and disagreement even as the majority disagreed with the recommendation. Policy makers and any future working groups should examine the recommendations and comments to better understand the sources of the divergence.

Connecting the Dots: Policy Recommendation Overlaps and Connections

Many of the 92 policy recommendations overlap with each or are connected to each other. Working Group participants, in policy survey comments (Annex 8) and in further discussions noted these overlaps and connections and recommended that related policies be considered together. Examples of these overlaps and connections include:

- Submetering is addressed by 1.04, 1.12, and 8.02
- Net metering (NEM) is addressed by 1.16 and 2.16
- Cost-effectiveness and cost-benefit analyses are addressed by both 4.01 and 4.04
- Stationary batteries co-located with EV charging is addressed by 1.01, 2.20, and 7.06
- Charging infrastructure funded by the CEC or by utilities and other LSEs is covered by 2.05 and 2.06
- Market participation of V2G resources is addressed by 3.04 on system services from V2G and 3.07 on participation options for V2G
- Backup power and resiliency (vehicle-to-building V2B and vehicle-to-microgrid V2M), including pilots and incentives, are addressed in different ways by 2.08, 5.02, and 5.03
- Extending SGIP to VGI is addressed by 2.12 and 7.04
- Incentives for charging infrastructure in new construction are addressed by 8.01, 9.01, and 11.05
- Four recommendations relate to opening up new value streams that can be captured by EV energy management systems (EV EMS), and also provide an additional type of "incentive" or benefit-enabler: 2.04 on BTM load balancing to avoid distribution system upgrades, 2.17 on customer load management to avoid or defer utility distribution upgrades, 2.22 on non-wires alternatives to similarly avoid or defer utility distribution upgrades, and 2.18 on multiple EVs sharing a single charging station

Policy Recommendations Related to Policy Action Already Underway

There are many policy actions and venues already underway related to VGI. The Working Group took note of a full array of policy actions already underway that related to its policy recommendations. In particular, there are 16 recommendations flagged as relating to "policy action already underway" by the CPUC Energy Division (Table 12).

However, even though action is already underway related to a policy recommendation, the Working Group recommends that all such policy recommendations still be considered in strengthening or extending any existing or planned policies, and that other proceedings that may be addressing these policies take note of these recommendations.

This is underscored by the fact that almost all of the 16 recommendations in Table 12 have strongest or good agreement. For example, two policies related to submetering, 1.12 and 8.02, have good agreement, indicating that the CPUC may wish to further consider sub-metering policy development. There is also strongest agreement for 1.13 on time-variant charging rates, 2.09 on pilots, 2.11 on dealer

incentive programs, and 9.03 on ME&O budgets. Two recommendations, 2.24 on LCFS smart charging and 6.04 on NEM tariffs, received "majority neutral" classifications.

Many others of the 92 recommendations put forward by the Working Group may also relate to actions already underway and Table 12 is by no means comprehensive. The detailed information on policy recommendations (Annex 6) contains further notes on related proceedings and other venues. Table 12 only represents partial information collected from participants and comments by CPUC Energy Division staff. Further comments by Working Group participants on other actions already underway and the need to strengthen actions already underway are linked in Annex 1.

Table 12. Recommendations Related to Policy Action Already Underway

Recommendations	**CPUC Energy Division Staff on Action Already Underway**
Establish EV TOU rates that don't require separate metering or submetering (1.04) If dynamic rate is unavailable, increase the differential between standard and EV TOU off-peak charging rate (CPUC comment: already adopted) (1.08) Develop a standard implementation guide for utilities to provide real-time price and event (control) signals to EVSEs, Charging Station Management Systems (CSMSs) and EV drivers (1.11) Retail EV charging rates should reflect cost of generation, delivery, GHG, and other relevant value streams; all EV charging rates should be time-variant, starting with simple TOU rates and then enabling optional alternatives such as dynamic rates (1.13) Reduce or eliminate demand charges for DCFC, but scale up with utilization to create more demand-responsive rate (11.01)	Multiple rate cases are already considering these policies, or some policies are addressed through recently implemented rates or proposed commercial EV rates under review
Re-examine or use existing AMI alternative approaches to submetering in residences for EVs, DERs and demand responsive appliances to lower cost and level the playing field for DERs (1.12) Finalize submetering protocols/standards to increase accessibility to more favorable EV TOU rates (8.02)	These are already being addressed through ongoing submetering work in the DRIVE OIR
Require managed charging capability in utility customer programs, incentives, and DER procurements (2.05)	All IOU programs currently require load management participation for customers to be eligible
Require all government-funded charging infrastructure to have smart functionality (2.06) Leverage existing pilots to identify bottlenecks for increasing deployment and reducing costs. Encourage utilities and other LSEs, in partnership with private entities, to establish dedicated programs for school bus charging (2.09)	These are already a goal in the Draft TEF
Create an EV Dealership VGI upfront incentive program whereby utilities can reward dealers for installing or enabling VGI functionality at point of sale (2.11)	SDG&E and Plug-in America are already testing this in a pilot and results are pending and other similar testing of this concept will occur as more dealers sign up to participate in the LCFS upfront rebate program

Align LCFS smart charging framework with IOU TOU rates (2.24) **	Aligning the LCFS incremental incentives with IOU TOU periods is already a requirement in CARB's regulation. The smart charging pathway is currently based on the CPUC avoided cost calculator. **
Drastically simplify NEM tariffs and streamline NEM applications for EVs; and encourage better communication of EV TOU and NEM rates to the general public and businesses (6.04)	There is already a NEM 3.0 effort underway, and multiple efforts to streamline/simplify EV rates to ensure they can be combined with solar-plus-storage.
Incentives for Title 24 new construction – residential multi-unit dwellings and some commercial and industrial parking facilities (especially workplace and large destination) (8.01)	Consistent with a CPUC staff proposal; new construction incentives are addressed in Section 5 of the Draft TEF
Utilities develop coordinated ME&O budgets through transportation electrification plans, to inform EV customers of the lower cost of fueling EVs using dynamic rate options and other VGI opportunities (9.03)	Every IOU program budget already includes ME&O, and the draft TEF proposes a new aligned ME&O effort. The Draft TEF section 11.2 mentions TOU rate education, and this could be re-focused to provide direction and alignment. Non-IOU ME&O is also stated in draft TEF.
Prevent policies that make VGI a primary goal over the needs of drivers or CARB and AQMD mandates to support 2045 carbon neutrality and 2030 air quality requirements; don't add net cost to TE end users or hinder EV adoption or equity goals due to VGI and fund efforts to study and monitor this issue (10.01)	This is a goal for all CPUC programs approved for IOU ratepayer funding,

** Recommendation 2.24 on LCFS smart charging falls under the jurisdiction of CARB as the lead agency. The inclusion of this recommendation as related to policy action already underway is based upon CPUC Energy Division staff comments confirmed by CARB.

Digging Deeper: Policy Strategy Tags

Each of the 92 recommendations has one or more "policy strategy tags" that the Working Group assigned. This mapping of tags can show the collective contribution of policies to achieving distinct policy strategies and goals. Annex 7 shows which recommendations in which categories are associated with 16 different policy strategies and goals.

Medium- and Long-Term Policy Recommendations

There are 15 recommendations that address the medium-term (2023-2025) or long-term (2026-2030), given in Table 13. All of these are either strongest agreement (1.15, 1.18, 3.03, 5.03, 7.13) or good agreement, with just one classified as majority neutral (1.19 on performance-based ratemaking).

Table 13. Medium-Term and Long-Term Policy Recommendations

Rec #	Policy Recommendation
Medium-Term	
1.15	Prompt CPUC approval of time-varying EV rates applications
1.17	In addition to an EV export bill credit (under NEM or another framework), a supplemental credit should be considered for environmental component, e.g., based on SGIP GHG signal to determine marginal emissions rate
1.18	Establish voluntary "critical peak pricing" tariffs for non-residential charging that offer reduced TOU rates except during event-based flex alert or critical peak periods, while providing significantly increased on-peak prices
2.21	Provide a performance-based incentive to temporarily provide grid services, for building owners or EVSP providers who recruit a certain fraction of EV drivers to opt in, implemented as a long-term contract through procurement
2.22	Issue non-wires alternative competitive procurements (RFOs) targeted to EVs/EVSPs that can limit demand during peak times
3.03	Enable aggregations of EVs on managed charging to participate as resources in real-time energy markets and ancillary services market
3.04	Need clarity and conclusive decision on what pathway (PDR vs. NGR) will enable V2G resources to offer Day-Ahead Energy and RA System services, and clarity on PDR timeline and roadmap if PDR is the chosen pathway
3.05	Alternative PDR participation model or new capacity-only designation for resources to provide ancillary services only, to allow BTM charging to participate, single site or aggregated
3.07	Coordinated effort by state agencies and IOUs and other LSEs to establish market rules and participation options for separately metered V2G customers.
5.03	Develop standards and requirements for buildings which will support the use of the EV's main power batteries for customer resiliency
7.13	Create a mechanism which allows for quick approval of demonstrations for technology and for determining market interest
7.14	Pilots for shared charging infrastructure for commuter-based fleets, both public and private, including transit commuter buses and company fleets and shuttles.
Long-Term	
1.19	Institute performance-based ratemaking that includes both capital expenditure and operational expenditures, to encourage more efficient EV-related distribution build-out
1.20	Create tariffs specific to medium/heavy duty vehicles, fleets, and rideshare
6.11	Coordinate the development of interconnection and technical standards with the VGI Working Group effort

As the CPUC and other agencies and entities move forward with the short-term recommendations, and also begin to address the mandates of SB 676, these medium- and long-term recommendations will be relevant. The Working Group's suggested next steps in this report's Conclusion section address this further.

SECTION C. PUC QUESTION (C): HOW DOES THE VALUE OF VGI USE CASES COMPARE TO OTHER STORAGE OR DERs

The Working Group did not provide a direct answer to PUC Question (c), "how does the value of VGI use cases compare to other storage or DERs," but does offer guidance on how to complete this work going forward.[53]

Discussions revealed that this is a complex topic which can require a great deal of analytical resources and expertise. To answer the question quantitatively in the manner originally envisioned would require rigorous cost-benefit analysis. Due to time, data, and expertise constraints, the Working Group did not perform cost-benefit or cost-effectiveness analysis of either VGI use cases or other DER use cases. The Working Group also faced limitations in getting private-sector cost information and could only assess costs on a relative basis. And given that the Working Group was comprised entirely of volunteer participants, many of whom did not have direct expertise in storage and other DERs, there was insufficient time, volunteer availability, and expertise to consider the value of storage and other DER use cases.

Instead, the Working Group recommends that the PUC address this question through further efforts with the necessary expertise, for both VGI and other DERs. These further efforts can recognize and incorporate the wealth of work and perspectives on VGI use cases produced by the Working Group (see Annex 1 for the materials produced by the Working Group).

Guidance on How to Compare VGI with Other DERs

The Working Group suggests that further efforts consider three approaches to comparing VGI with storage and other DERs: quantitative cost-benefit comparisons, qualitative comparisons, and use-case-based comparisons.[54] Each of these approaches has its merits and difficulties, as noted in Table 14. The Working Group also identified some potential resources and references related to costs, benefits, and value comparisons that could be considered in further efforts, although these resources were not reviewed or assessed (see Annex 3).

Table 14: Recommended Approaches for Comparing VGI with other DERs

Approach	Merits	Difficulties
1. Quantitative cost-benefit comparisons	• Provides numerical comparisons of value • Can also incorporate the value of managed charging (including direct and indirect, V1G and V2G) vs. unmanaged charging • Satisfies direction from CPUC in DRIVE OIR; complies with CPUC D.19-05-019	• Cost data difficult to obtain or not available; may require demos or pilots to provide data • Potential disagreement over the methodologies and assumptions employed in conducting numerical comparisons • Defining VGI cost additionality relative to baselines

[53] The Working Group notes that VGI is considered as one form of DERs and is defined as a DER in Assembly Bill 327.
[54] See D.19-15-09, CPUC decision guiding cost-effectiveness evaluation of DERs.
http://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M293/K833/293833387.PDF

2. Qualitative comparisons	• Can provide insight for policy making in supporting VGI and in having the value of VGI complement the value of other DERs • Can also give insights into the first and third approaches	• There are many possible scenarios to compare, and the results of one scenario cannot necessarily be compared to the results of another scenario • Does not comply with CPUC direction in DRIVE OIR that VGI be compared to other DERs; does not comply with CPUC direction on comparative analysis in D.19-05-019
3. Use-case-based comparisons	• Leverages the use-case work of the Working Group and potentially allows a simplified apples-to-apples comparison • Can provide insight for policy making in supporting policies associated with specific use cases • Can also be quantitative with similar merits and difficulties as the first approach	• Does not comply with CPUC direction on comparative analysis in D.19-05-019 • Lack of cost data to support comparisons; may require demos or pilots to provide data, or relative cost comparisons as was done by the Working Group for VGI use cases • There are many distinct VGI use cases and comparing on an individual basis can be time-consuming • Requires developing the equivalent DER use cases to match VGI use cases, which the Working Group has not done • What metrics would be measured? What does a positive or negative comparison look like?

1. Quantitative cost-benefit comparisons. A variety of potential studies are available that could address quantitative comparisons; see Annex 3. However, the Working Group did not assess or endorse any quantitative studies, given time and expertise limitations. It is not clear the extent to which existing studies provide cost-benefit comparisons of VGI with other DERs that would be relevant to California. Thus, even identifying and selecting such studies will be a significant effort. One next step would be to establish the criteria that should be used for selecting, assessing, and utilizing such studies, including the relevance to California.

Participants noted a number of methodological issues that would need to be considered and addressed in conducting quantitative cost-benefit comparisons. On the costs side, participants noted there is a scarcity of publicly-available cost information, underlined by the difficulties and time constraints that the Working Group faced in getting private-sector participants to share cost information during the process to score use cases on costs, benefits, and ease of implementation (see Section B). Given more time, additional data would potentially have been available. There is a continuing need to first develop better cost information, such as from large-scale demonstrations and competitive solicitations, and to further identify existing public sources of cost data. This may be a case when "an ounce of commercial activity would be worth a pound of research."

The definition of "costs" itself is not straightforward, considering the different costs (and prices) to different parties involved in a particular use case, such as equipment and vehicle providers, customers, electricity providers, and aggregators (for further discussion see Annex 1 links to materials on cost methodologies). Some participants also highlighted the need to better define the incremental or additional costs associated with VGI, as distinct from costs that would otherwise be incurred anyway in

owning and operating EVs, such that true "apples-to-apples" comparisons of VGI costs and benefits can be made.[55]

On the benefits side, there is a need for a consistent set of assumptions for the benefits from the same service utilizing VGI compared to other DERs. The benefits of VGI can also come from complementary roles with other DERs, in which the value of the other DERs may also increase. Such complementary roles need further understanding when making comparisons between VGI and other DERs.

Further, there is considerable scope for determining the best metrics for reporting on cost-benefit comparisons of VGI with other DERs, including such metrics as gross bill savings, net customer savings, customer benefit/cost ratio, and other standardized cost-benefit metrics including those that address ratepayer impacts and societal costs. Some participants of the Working Group said some metrics should be prioritized over others.

2. Qualitative comparisons. A qualitative comparison of a VGI use case with another DER use case can highlight the uniqueness and potential benefits of VGI in both complementary and substitution roles relative to other DERs. Qualitative comparisons can be developed in terms of characteristics such as location, resource availability, market participation and pricing, application, size/scale, ownership, capital investment, lifetimes of equipment and contract periods, and environmental benefits. For example, a stationary battery for a residential or commercial building might be compared with an EV for personal use along these dimensions, with the following *possible illustrative* conclusions:[56]

- Location and resource availability: a stationary battery may have comparatively greater availability but only for a fixed location, while EVs may have more limited availability but offer many variable locations from which to provide grid services needed at a given time and location.
- Market participation: both EV and stationary battery are subject to retail pricing but there are differences in how they can participate in the wholesale market
- Size: an EV battery is typically larger than a residential stationary battery, while the opposite can be true compared to a stationary battery in a commercial building
- Scale: EV batteries must typically be aggregated to a larger scale for participation in wholesale markets and do not need to be separately metered, while commercial batteries may participate individually and must be separately metered.
- Capital investment: EVs don't have to be purchased or leased by distribution utilities and LSEs to obtain the benefits of storage for their distribution grids and load-serving needs, in contrast to utility-scale stationary storage owned by distribution utilities and LSEs.
- Lifetimes of equipment and contract durations: an EV will typically have a lifetime of 5-10 years and contract durations as short as one year, while a stationary battery will typically have a lifetime of 10-20 years and longer-term contractual periods.

3. Use-case-based comparisons. Some storage and other DER use cases could be characterized along some of the same six dimensions of the use case assessment framework that Working Group employed to assess VGI use cases. These dimensions include Sector, Application, Type, Approach, Resource Alignment, and Technology (see Section B). Participants noted in particular the potential overlap of the

[55] See D.19-15-09, CPUC decision guiding cost-effectiveness evaluation of DERs. http://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M293/K833/293833387.PDF

[56] Annex 1 gives a further resource by Sumitomo provided to the Working Group as an example of a qualitative comparison.

Sector, Application and Approach (direct vs. indirect) dimensions of VGI use cases with other DER use cases. If VGI and other DER use cases can be put into the same framework, then storage and other DER use cases could potentially be scored (by DER experts) in the same manner that the Working Group scored VGI use cases. The resulting scoring of both VGI use cases and other DER use cases could be compared on a similar basis, for benefits, costs, and ease of implementation. Such comparisons should:

- Configure the comparisons to compare "apples-to-apples" as much as possible
- Compare based on which DERs provide which grid services (i.e., for the same application)
- Compare by sector—home, fleet, workplace, public, large MUD, etc.; and for different viewpoints—customer, ratepayer, utility, CCA, etc.
- Identify which VGI use-cases have higher vs. lower potential benefits for utilities & ratepayers, how low technology costs would have to be to enable those use-cases, and how much value would arise from spending a similar amount of customer/ratepayer dollars for other DERs that can provide the same services.
- Map out dimensions of sector-based "complex" or "multi-use application" use cases (i.e. one sector, many applications) from the perspective of existing utility and other LSE DER programs – such as NEM, SGIP, EE, CPP/BIP. See which use cases from the VGI Working Group map to which use cases supported by these other DER incentive programs.

Such comparisons between VGI use cases and other DER use cases providing the same or similar services can illuminate trade-offs between the two options for a decision-maker, as well as provide a bottom-up understanding to complement top-down market-based comparisons.

Some Other Viewpoints

Some Working Group participants disagreed with the emphasis on quantitative comparisons and cost-effectiveness for VGI implied by PUC Question (c). Rather, they favored a focus on PUC Question (b) and continuing to focus on policies for "leveling the playing field" for VGI, and understanding and prioritizing the highest-value activities and policies for EV adoption and managed charging for both near-term and long-term.

Some Working Group participants also emphasized pursuing further comparative analyses of scenarios with managed charging via VGI, compared to scenarios with continued unmanaged charging. In their view, the most informative and relevant comparisons are to be made between scenarios with VGI (containing direct managed charging and/or adoption of time-varying rates) and counterfactual scenarios of unmanaged charging without VGI. Here again, VGI value can be discovered or determined based on analytical cost-effectiveness assessments or market-derived cost-competitiveness information.

CONCLUSION AND NEXT STEPS

The VGI Working Group is proud to present this report and associated materials. Working Group participants were motivated by a conviction that VGI affords many potential benefits. Many opportunities to realize these benefits are available today and will grow rapidly as EV adoption expands, as shown by the extensive work completed by the Working Group on use case assessment and policy recommendations. This work provides a solid foundation for the next stages of VGI in California.

The high degree of cooperation and collaboration achieved–among over 85 organizations and individuals participating voluntarily during the ten-month course of the Working Group—also demonstrates that VGI is a unique and effective convening umbrella or venue for fostering collaboration between the electric power and EV/charging sectors, and among many types of industry, government, advocacy, research, and utility and CCA stakeholders.

The next steps beyond this report for California state agencies, the California ISO, utilities, community choice aggregators and other load-serving entities, and other VGI stakeholders could include:

Policy actions

- Continue inter-agency efforts to advance VGI understanding, piloting, and large-scale deployment, leveraging private and public funds for that effort. Efforts should be inclusive and cover a wide variety of VGI solutions at different levels of maturity and readiness.
- Prioritize actions and resources to ensure robust and streamlined implementation of the 92 policy recommendations produced by the Working Group, taking into account the 1200-plus detailed comments generated by the Working Group on these recommendations.
- Use the policy recommendations and other materials from this report to inform and motivate state agency action on several ongoing VGI issues, including V2G interconnection, submetering, VGI customer programs, and EV rate design.
- Map the use cases put forth by the Working Group onto existing and planned California policies and programs for transportation electrification, and identify gaps in policies and programs for addressing priority use cases.
- Further explore and understand the implications and relevance of this report for the development of the Transportation Electrification Framework (TEF).
- Use the policy recommendations and other materials from this report to inform development of the strategies and quantifiable metrics called for by SB 676.

Interagency coordination and convening

- Convene a further working group or other venue composed of both VGI and DER experts and industry representatives, to conduct comparisons of VGI use cases with other DER use cases, perhaps starting with “net value” analysis on the use cases put forward by the Working Group.
- Coordinate and fund an inter-agency effort to conduct the demonstrations and pilots recommended by the Working Group based on collaborative and coordinated actions across agencies.

Further analysis

- Assess customer interest, acceptance, and retention, and what is required (and associated costs) to get customers to participate in VGI programs (e.g., incentives, marketing, dealership education).
- Identify and obtain publicly available data on VGI costs, as well as baseline data on driving and charging patterns relevant to different use cases.
- Conduct cost-effectiveness tests and cost-benefit analyses as part of further answers and understanding of PUC Question (a) on use case value and PUC Question (c) on comparisons with other DERs, and as part of assessing impacts of pilots, programs, and policy recommendations.
- Building on the single-application use cases defined in Section A, further define and explore "complex" or "multi-use application" (multiple application) use cases that can "stack" or combine the values of multiple services and benefits for single use case.
- Undertake a focused and detailed review of the results from the use-case value scoring exercise, to identify next steps for understanding VGI net benefits, with emphasis on use cases that were not scored but could provide value in the medium- and long-term.

California can become a global leader in transportation electrification and VGI implementation, but only with concerted and committed efforts to improve regulatory policies and expand market opportunities. The Working Group showed that there are many potential VGI use cases that can provide value, and that the potential market for VGI solutions is diverse and interwoven across a broad swath of the transportation and power sectors. Given the use case assessment work performed by the Working Group, it appears that the work of developing markets for VGI solutions will demand persistent action for the next several years. California should take an inclusive and collaborative approach to VGI opportunities given the evolving nature of the regulatory and market landscape.

The Working Group, consisting of organizations voluntarily contributing their limited time and resources, commends this report to the leaders of the California ISO, CEC, CARB, and CPUC. We ask for thoughtful consideration of these recommendations and a timely response to this plea.

GLOSSARY

Aggregator – an entity that aggregates, coordinates, and controls multiple DERs to provide energy services as an aggregate of the individual DER capacities and capabilities.

Ancillary Services – energy services that do not directly feed load, but keep a power system functional; e.g. – voltage and frequency regulation, reactive power injection.

Behind the Meter (BTM) Storage – energy storage systems that operate "behind the meter," i.e not on the transmission or distribution system, but onsite with an electricity customer.

Curtailment – the intentional reduction of output of a renewable energy system below what it could have otherwise produced.

Demand Charge – a charge for the maximum capacity that a customer uses during a billing period.

Demand Response – a strategy wherein loads are taken offline or curtailed in order to lower system demand. A variety of controls are possible, from passive time-varying rates to direct and active commands from the load-serving entity or from an aggregator.

Distributed Energy Resource – energy resources - including small scale power generation, energy storage, energy efficiency, energy demand response, and electric vehicles – that operate onsite at a customer's premises or business, or on the distribution level of the power system.

Distribution Upgrade Deferral – any investment that allows for the delay or nullification of planned system upgrade investments, such as local DERs or customer energy management systems.

Electric Vehicle Service Equipment – any equipment that is used directly to charge electric vehicles, or is used to connect vehicle chargers to the power grid or other energy resources.

Electric Vehicles – Vehicles that solely employ electric motors and batteries, or hybrid plug-in vehicles that combine electric motors and batteries with internal combustion engines that can be charged from an external power source. Also called plug-in electric vehicles (PEVs).

Electricity Service Providers – any load-serving entity (LSE) that offers electric service to customers within a given service territory

Grid Interconnection – the point of connection between a DER and the distribution grid.

Inverter – a device that converts DC (battery) power to AC (grid) power and vice-versa.

IOUs – Investor Owned Utilities are Load Serving Entities (LSEs) that fall under the regulatory jurisdiction of the CPUC, as compared to other LSEs such as community choice aggregators (CCAs) and municipal-owned utilities (MOUs) that do not.

Load Serving Entities – entities that have been granted authority pursuant to state or local law or regulation to purchase wholesale electricity and directly serve electricity to retail customers; investor-

owned and municipal utilities, as well as electric co-ops and community choice aggregators are load serving entities in California.

Managed Charging – coordinated shift/modulation of time or level of EV charging or discharging in response to a variety of possible signals, both passively (indirect use cases) and actively (direct use cases); examples of signals are time-varying prices and signals of grid conditions; includes unidirectional V1G and bidirectional V2G and V2B/V2H as well as indirect and direct control approaches.

Microgrid – an integrated localized grid system that can operate independently from connection to the larger grid. Microgrids can vary in size from single-home scale to a variety of community scales.

Peak Period - the period in a given time frame at which the power system is experiencing its peak demand.

Peak Demand – the greatest level of energy needed within a given time period.

Point of Common Coupling – the point where the generating facility's local electric power system connects to the electrical company's electric system, such as the electric power revenue meter or at the location of the equipment designated to interrupt, separate or disconnect connection to the grid

Resiliency – the ability of the grid to operate during potential disruptions; and also the ability to provide local or customer-level solutions if the grid undergoes an accidental or intentional outage and is not available.

Resource Adequacy – a set of regulatory and planning constructs used to ensure that there will be sufficient generating resources available to serve electric demand under all but the most extreme conditions

Submetering – the measurement of electricity consumed by a specific load, such as an EV, separate from or as part of a customer's overall metered account.

Time-Varying Rates – an energy tariff wherein the price of energy varies depending on the time of day; can be static time-of-use (TOU) rates fixed for specific times of the day, or dynamically varying.

Uni-Directional / Bi-Directional Grid Interactions – EV use cases are defined by the flow of energy between the EV and the source powering it. Uni-directional grid interactions are situations in which power flows from the grid to the EV. Bi-directional grid interactions specify situations in which power can flow from the grid to the vehicle and vice-versa.

Use Case – use cases represent the different ways in which EV charging can be integrated with the grid (or home/local power system) to provide value. Use cases help articulate how value streams can flow to different stakeholders, including EV owners and fleet managers, workplaces and other charging site hosts, charging service providers, utilities and CCAs, ratepayers, and grid operators.

Value Stacking – obtaining multiple value streams and services, for example both customer bill management and system day-ahead energy, from a given VGI use case.

APPENDIX B

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Vehicle Grid Integration Implementation and the Draft Transportation Electrification Framework

Energy Division Staff Paper

August, 2020

Contents

Purpose

The purpose of this Energy Division staff paper is to supplement staff's draft Transportation Electrification Framework (TEF) with new information as a result of the Vehicle Grid Integration (VGI) Working Group Report issued in June 2020. This paper aims to:

- Provide staff recommendations from a VGI perspective on cross-cutting draft TEF topics including cybersecurity, equity, implementation process, and metrics;
- Provide information regarding which existing California Public Utilities Commission (CPUC) venue(s), if any, would be appropriate to consider the VGI Working Group policy recommendations that identify CPUC as the lead agency;
- Supplement staff's draft TEF with additional questions for parties to consider when providing comments including areas where parties could provide additional information or fill information gaps regarding VGI Working Group policy recommendations; and
- Identify policy recommendations that may be related to topics in the draft TEF but that staff believes are not timely for consideration now.

VGI Policy Background

In August 2019, Energy Division staff launched the VGI Working Group with eighty-five participants. They included the California Air Resources Board (CARB); California Independent System Operator (CAISO); California Energy Commission (CEC); utilities including community choice aggregators; electric vehicle (EV) manufacturers; battery manufacturers; charging network and energy service providers; advocacy and research groups; industry associations; and ratepayer interest groups. The DRIVE Order Instituting Rulemaking (OIR) R.18-12-006 tasked the VGI Working Group with addressing three questions:

1. What VGI use cases can provide value now, and how can that value be captured?

2. What policies need to be changed or adopted to allow additional use cases to be deployed in the future?

3. How does the value of VGI use cases compare to other storage or DERs?

The VGI Working Group identified many potential VGI benefits including, but not limited to:
● Lower the total cost of EV ownership and accelerate individual and fleet EV adoption – resulting in savings to owners - and avoid carbon and criteria pollutants;
● Reduce ratepayers' costs by reducing congestion on existing power distribution infrastructure, avoiding costly distribution system upgrades, and providing other grid services;
● Support further electric sector decarbonization by avoiding curtailment of renewables; and
● Improve grid resiliency and security.

The June 30, 2020 VGI Working Group Report provided 90 policy recommendations in response to the second question, including timing, relevant use cases, metrics and other information. The Working Group vetted each recommendation through discussion, surveys and qualitative feedback. Table 1 shows 11 categories containing the 90 recommendations, listed in the right column, that address a broad range of end goals, which are listed in the left column.

Table 1. Policy Recommendation Categories

End Goal	Policy Recommendation Category (and related VGI Working Group Policy Recommendations)[1]
Market signals create market demand	1. Reform retail rates (1.01, 1.02, 1.04, 1.05, 1.06, 1.07, 1.08, 1.09, 1.10, 1.11, 1.12, 1.13, 1.14, 1.15, 1.16, 1.17, 1.18, 1.19, 1.20 and 6.04)
	3. Design wholesale market rules & access (3.01, 3.03, 3.04, 3.05, 3.07 and 2.01)
Demonstrate early stage technology development and evaluate data to show market readiness	4. Understand and transform VGI markets by funding and launching data programs, studies and task forces (4.01, 4.03, 4.04, 4.06, and 10.12, 10.13, 10.14, 10.15)
	5. Accelerate use of EVs for bi-directional non-grid -export power/public safety power shutoffs (PSPS) (5.01, 5.02, 5.03)
	6. Develop EV bi-directional grid-export power including interconnection rules (technology development sub-set of category 6 - 6.03 and 6.07)
	7. Fund and launch demonstrations and other activities to accelerate and validate commercialization (7.03, 7.04, 7.05, 7.06, 7.07, 7.09 7.11, 7.13, 7.14)
Adopt standards to enable VGI services	6. Develop EV bi-directional grid-export power including interconnection rules (6.11 re: standards coordination)
	8. Develop, approve, and support adoption of other non-interconnection technical standards (includes 8.02 and 1.12, 10.09)
Overcome capital costs, infrastructure, information other barriers and scale VGI services	2. Develop and fund government and utility customer programs, incentives, and DER procurements (2.01, 2.02, 2.03, 2.04/2.17, 2.05, 2.06, 2.07, 2.08, 2.09, 2.11, 2.12, 2.13/2.23, 2.14, 2.15, 2.16, 2.17, 2.18, 2.19, 2.20, 2.21, 2.22, 2.24 and 1.19, 10.10, 10.11)
	9. Fund and launch market education & coordination (9.02)
	11. Conduct other non-VGI-specific programs and activities to increase EV adoption (11.01, 11.02, 11.03, 11.04, 11.05 and 7.01, 7.02, 8.01)
Agency coordination	10. Enhance coordination and consistency between agencies and state goals (10.01, 10.02, 10.03, 10.04, 10.05, 10.06, 10.07 and 9.01)

The Working Group also provided extensive information regarding potential use cases in response to VGI Working Group Question 1 as shown in the final VGI Working Group Report. Use cases were created based on six aspects such as vehicle type, service provided, approach, whether one actor controls all aspects of charging, and others. Each VGI Working Group policy recommendation references related use cases. (Several recommendations in category 4 of the above table are intended to further improve understanding of use cases including costs and benefits.)

In addition, CARB, CAISO, CEC, CPUC and a group of community choice aggregators provided stocktakes of existing VGI actions (see VGI Working Group Report A-3).

[1] Energy Division staff grouped each recommendation in the category where it fit best, which in some cases was different from the category identified by the participant in the VGI Working Group that proposed the recommendation.

Draft Transportation Electrification Framework

Energy Division staff released a draft TEF in February 2020 in Rulemaking (R.) 18-12-006 to catalyze the development of a holistic strategy for how IOUs can best support California's clean transportation and clean energy goals. The draft TEF includes a number of topics that intersect with VGI policy recommendations. For instance, the VGI section (11.1) lists the requirements of Senate Bill (SB) 676 (Bradford, 2019). Other draft TEF sections that are relevant or potentially relevant to the VGI Working Group recommendations include: equity (6); time-of-use (TOU) rates (9); electric vehicle supply equipment technical standards (8.1); emerging technology program (8.5); CALGreen building codes (10.2); market education & outreach (11.2); cybersecurity (8.2); targets and metrics (3.4); near-term priorities including resiliency (5.2) and new building construction (5.5); and others.

Senate Bill 676

In October 2019, Governor Newsom signed SB 676 (Bradford, 2019) establishing Pub. Util. Code §740.16 that set out the following requirements (and others not listed here):

- §740.16(b)(1): establishes a definition of "electric vehicle grid integration" (or VGI) and grants the CPUC authority to revise this definition if necessary.

- §740.16(c): directs the CPUC to, by December 31, 2020, adopt strategies and quantifiable metrics to maximize the use of feasible and cost-effective electric vehicle grid integration by January 1, 2030 based on specific criteria. §740.16(b)(2) states that VGI "shall not require the use of any specific technology" and "may be achieved using multiple strategies, including, but not limited to, the adoption of an electrical rate design, a technology, or a customer service, if that adoption helps provide net benefits to ratepayers."

- §740.16(i): requires that each IOU "shall, in each of its load research report compliance filings or alternative compliance filings submitted to the commission, report the electrical corporation's annual measurable progress in furthering the electric vehicle grid integration strategies adopted pursuant to subdivision (c)."

- §740.16(j): states that the CPUC shall review these IOU reports and may, if appropriate, issue additional future recommendations to ensure reasonable progress toward VGI goals.

An ALJ ruling issued in the DRIVE rulemaking on July 21, 2020, requesting party comments on what strategies and quantifiable metrics the CPUC should establish under SB 676 and how they meet SB 676 statutory criteria.

VGI Roadmap Update

The CEC is leading a VGI Roadmap Update with CAISO, CPUC, CARB and stakeholders. This effort stems from the CEC's 2017 Integrated Energy Policy Report recommendation to update the 2014 California VGI Roadmap to reflect "the needs to use open standards, to return the value of grid integration to stakeholders, and to commercialize prior investments in research and maintain leadership in advanced technology development." The update will include actions that California can take to advance VGI and help meet the state's 2025 and 2030 zero-emission vehicle adoption goals. Interested parties are encouraged to participate in this process, which may consider VGI Working Group recommendations that list the CEC as the lead agency as well as other topics (this staff paper does not address action items that are specific to the CEC).

Energy Division Staff Response to VGI Working Group Policy Recommendations

Table 4 in the Appendix contains the 55 VGI Working Group policy recommendations that list the CPUC as the lead agency as well as others that list the CPUC as a supporting agency and are related to topic(s) in the draft TEF, as well as the proposed metric(s) if any (the VGI Working Group surveys and VGI Working Group policy recommendations database contain more details from the Working Group). The table also includes the following information:

- Open proceedings outside of the DRIVE OIR where interested parties may raise policy recommendation(s) for CPUC consideration (which may require becoming a party).[2]
- Policy recommendations that staff believes are related to topics in the draft TEF and should be considered alongside the original staff draft TEF; staff also identified additional questions regarding these policy recommendations and how they could be implemented for parties to consider when providing comments on the draft TEF.
- Policy recommendations that staff believes are related to topics in the draft TEF but should not be considered at this time. Based on VGI Working Group quantitative rankings, qualitative feedback and other information, staff believes that these recommendations are less urgent and/or require additional development to identify clear action items. Staff recognizes that VGI is a rapidly evolving field. Thus, these recommendations may deserve future consideration after stakeholders and staff learns more about VGI markets and technologies (future evaluation and updates are described later).

Cross-Cutting Policy Topics

Cybersecurity

The draft TEF section 8.2 (cybersecurity) proposes to require that IOUs adopt best practices for cybersecurity and implement a cybersecurity gaps analysis and take corrective action where needed. Staff believes that this approach is also relevant to implementation of VGI policy recommendations and has compiled a list of potentially relevant standards development organizations based on informal discussions by interested VGI working group participants including Energy Division staff.[3] Any relevant standards from these organizations should be considered when addressing VGI as part of cybersecurity best practices adoption and the gaps analysis and any corrective action. This list of organizations may not be complete and is not intended to endorse any specific standard(s).

- Canadian Standards Association
- International Organization for Standardization
- Institute of Electrical and Electronics Engineers
- National Institute of Standards and Technology
- Open Charge Point Protocol
- SAE
- Underwriters Laboratory

While the comment deadline on the draft TEF cybersecurity (8.2) section has passed, the SB 676 ruling issued July 21, 2020 allows party comments on cybersecurity.

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[2] VGI Working Group policy recommendations often include a list of relevant proceedings identified by the author. In many cases staff agrees and in others staff provided updated information.

[3] The VGI Working Group discussed one more of the cross-cutting topic at a VGI Working Group workshop as well as two follow-up conference calls with interested participants.

Equity

Ensuring that residents of Environmental and Social Justice (ESJ) communities, including disadvantaged communities (DACs) and low- and moderate-income customers, can benefit from VGI implementation strategies (by generating revenue and/or accruing other benefits) is critical to VGI's success. Participation in VGI can also incentivize greater EV adoption within these communities.[4]

The draft TEF contains broad Transportation Electrification equity guidance (section 6). Table 2 below contains Staff's proposed supplemental guidance regarding several types of VGI activities based on informal VGI Working Group stakeholder discussions and staff research. Parties may address these recommendations in comments on draft TEF sections 6 (equity) and/or 11.2 (VGI).

Table 2: Equity Recommendations

Potential VGI Activity	Proposed Recommendations
Incentive Programs	Any IOU program(s) that provide rebates to encourage VGI implementation should consider increased incentive levels for ESJ communities. These programs should also engage with community-based organizations to seek their advice on program design and implementation. IOUs should evaluate the potential to leverage EVs deployed by state and local equity programs as a VGI resource to benefit ESJ communities and support California policy goals. CARB identified potential Three-Year Clean Transportation Equity Investments of $390-$790 million (note that these estimates were prepared prior to the impacts of COVID-19 pandemic on state government resources).[5] Air Quality Management Districts and the CEC have also adopted equity-focused programs to support EV adoption.
Technology Demonstration	Any IOU-implemented VGI demonstrations could consider the DAC requirements set forth in Assembly Bill (AB) 523 (Reyes, 2017) for CEC demonstrations under the Electric Program Investment Charge (EPIC) program. CEC has met or exceeded goals that at least 25% of CEC EPIC technology demonstration and deployment programs projects are located in and benefit DACs and an additional 10% are located in and benefit low-income communities (EPIC 2019 Annual Report, CEC, p.24). We recognize that individual IOUs set different equity targets in transportation electrification programs due to the characteristics of their specific service territories.
Marketing, Education and Outreach (ME&O)	Customer engagement for DACs and low-income communities is an essential component of implementing ME&O strategies for VGI programs and rates: • "…many underserved community members lacked familiarity with how EVs worked." (Electric Vehicles for All: An Equity Toolkit, Greenlining.)[6] VGI programs and rates will likely add additional complexity. • Any planning & implementation of any VGI-focused ME&O program(s) authorized by the CPUC should leverage existing efforts to promote EV adoption in ESJs by state and

[4] Please see the draft TEF section 6 for description of ESJ communities and DACs.
[5] CARB Updated Three-Year Plan for CVRP, the ZEV Market, Clean Transportation Equity Investments, and Outreach Appendix C (September 2019).
[6] IOUs will likely need to survey customers to understand customer needs and solutions for ESJ communities such as access to capital for low-income residents, language barriers, and effective outreach channels.

	other agencies and community-based organizations.

Metrics

Staff asked VGI Working Group policy recommendation authors to propose metrics during the working group (see these proposed metrics in Table 4) as a benchmark for determining progress. In general, stakeholders did not comment on metrics included in VGI Working Group recommendations nor on gaps where the author did not include any proposed metrics. Parties that comment in support of a recommendation may consider commenting on whether the metrics identified in draft TEF section 3.4 and/or others are appropriate to fill gaps or make corrections or clarifications to metrics (if any) provided by the author of the policy recommendation (see comment opportunities listed in Table 4). Parties may also address in any such comments on VGI Working Group policy recommendation(s) whether metrics for such recommendation(s) should be coordinated with quantifiable metrics that are adopted under SB 676, and if so how.

Interested members of the VGI Working Group identified three categories of metrics relevant to VGI policy recommendations during informal discussions, and parties can consider these categories when providing any comments on the draft TEF regarding metrics. The three categories are: activity; program implementation; and outcomes as shown below in Table 3. Metrics regarding the activity stage may be most appropriate for new programs, tariffs, or rates (i.e. was a program. tariff, or rate adopted). Over time, program implementation metrics may become more relevant. Finally, outcome-based metrics reflect broad progress towards achieving end-goals without differentiating the contribution of any specific action, which may be useful when efforts to implement VGI recommendations scale to the point of achieving significant outcomes.

Table 3: Categories and Examples of Metrics

Category	Purpose	Examples (not intended to be comprehensive)
Activity	track adoption	o Was a new or revised IOU tariff adopted? o Was a new or revised rate adopted? o Was a new policy or program adopted?
Program implementation	track success of program implementation against program goals	o How many customers participated? o How many customers were educated? o How many demonstrations were implemented? o How many EV charging port installations were enabled?
Outcome	track aggregate progress across all programs and activities	o How many kilowatt-hours (kWh) or kilowatts (kW) were shifted, shaved or otherwise participated? o How many distribution upgrades were avoided? o How many tons of greenhouse gases (GHG) were avoided? o How many homes/communities have back-up power? o How many DAC and/or low-income customer participated? o How much revenue was generated to encourage EV adoption by residents and fleet operators?

Process for Implementing VGI Near Term Priorities

Staff recognizes that most of the VGI Working Group stakeholder recommendations call for action by 2021. IOUs would file Transportation Electrification Plans (TEPs) under the draft TEF that could serve as the vehicle for implementing policy direction in the draft TEF, but these TEPs would

likely not be filed in time for IOUs to take action on VGI recommendations by 2021. The draft TEF would allow IOUs to request approval for some activities through "pre-TEPs" after the TEF is finalized and prior to full IOU TEPs.[7] IOUs noted during the VGI Working Group that "As the TEF and associated TEP that will be developed may take some time before approval, the IOUs should be allowed to request through an application (or other appropriate process) to have funding set aside in pre-TEP years for VGI/transportation electrification activities."[8]

Staff suggests that parties consider, when commenting on the VGI section of the draft TEF (11.1), the following:

- What, if any, VGI related topics should be included in the list of pre-TEP topics (see Section 5 of the draft TEF for discussion of pre-TEPs) that could be included as part of a program application or pilot proposal to be filed as a pre-TEPs; and
- What other mechanism(s) currently allow, or could be modified to allow, implementation of the near-term VGI recommendations under the DRIVE OIR? Alternatively, would an alternative proceeding outside of the DRIVE OIR provide sufficient authority in lieu of taking action within the OIR?

We also note that SB 676 established in Pub. Util. Code §740.16(h) that "Each electrical corporation shall, in each of its applications to the commission for transportation electrification programs and investments filed pursuant to Section 740.12, quantify how the investments described in the application are expected to further the electric vehicle grid integration strategies adopted pursuant to subdivision (c)." Parties may wish to consider this SB676 requirement for IOU applications when commenting on the draft TEF regarding how and when IOU VGI policies and strategies should be implemented (the SB 676-related ruling noted earlier is the appropriate venue for comments on how the CPUC should implement SB 676 generally).

Evaluation Process

Staff recognizes that there is presently insufficient information to determine all of the policies needed to achieve VGI goals. The VGI Working Group report and policy recommendations identify a number of these information gaps (and a number of recommendations to remedy these gaps) and others will become apparent over time.

Staff proposes that one IOU issue a request for proposals (RFP) for third party evaluation of the IOUs VGI implementation to complement IOU annual reports required under §740.16(i) (as noted under SB 676 above) and scorecard reporting under the draft TEF (section 3.4). Staff proposes that the lead IOU develop an RFP scope of work in consultation with staff and the other IOUs; and include staff in the evaluation of bidders in response to the RFP. We also propose that the evaluator provide the draft report to staff for review, and complete the final report in time to publicly release the report four months after the release of the IOUs' second annual report under SB676 (likely in early 2023 based on SB 676 statutory requirements, though specific timelines have not yet been determined).

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[7] Section 5 of the draft TEF proposes to allow IOUs to file applications for TE that address "near-term priorities" before filing long-term Transportation Electrification Plans that fully address the planned future final TEF decision.

[8] https://gridworks.org/materials-produced-by-the-vgi-working-group/ See "Additional comments on policies database", cell D109.

The evaluator's report would build on, but not duplicate, routine IOU reporting by providing a wholistic qualitative evaluation of progress to date; identifying the latest best practices; and identifying other lessons learned such as areas for improvement based on initial experience and/or market or technology changes.[9] This information would inform utility staff, Energy Division staff, and stakeholders of whether the CPUC should consider revisions to policies under the DRIVE OIR (or other proceedings) and/or identify issues requiring future workshops or working groups.

In the longer term, as VGI markets and technologies are better understood, staff proposes that review of progress and updates would primarily occur through routine TEF and IOU TEP updates unless staff find reasons to recommend changes sooner.

Staff suggests that parties include in their comments on the VGI section of the draft TEF (Section 11.1) their opinions on when and how to review progress on VGI including comments on the staff proposal and/or alternative approaches; and the reasons for their proposed approach. Staff also suggests that parties comment on what type of coordination is necessary, if any, between evaluations of VGI programs and evaluations of other TE programs.

[9] The scope of work would be developed by all of the IOUs, with drafts and a final version provided to Energy Division staff for review and approval and issued by a lead IOU during the contracting process. Staff proposes that the lead IOU would begin contracting in time for the approval of a workplan within 15 days after the second year of IOU reporting is completed. We believe that this timing will balance allowing time for implementation of VGI strategies so that staff and stakeholders can learn from this experience and see some additional market and technology development trends; and providing timely evaluation information to enable opportunity(s) to make efficient mid-course correction(s) as needed.

Appendix –VGI Working Group Policy Recommendations and Energy Division Staff Feedback

Table 4: VGI Working Group policy recommendations for the CPUC and Energy Division Staff Feedback

WGI WG#	Policy Action Recommended by WGI WG Stakeholder(s)[10]	Energy Division staff identification of potential venues; and topics related to draft Transportation Electrification Framework	Metrics Proposed by VGI WG Stakeholder(s)
1.01	Rate design for demand charge mitigation to be enabled by stationary battery storage coupled to EV charging	**Parties may address whether any change to the rates section of the draft TEF are needed and if so what changes are needed and why in comments on draft TEF section 9.** IOU staff informed Energy Division staff that they have adopted (PG&E subscription rate, SCE commercial rates TOU-EV-7 through -9) or proposed (SDG&E Application A19-07-006) rates that replace the coincident peak portion of demand charges with peak period volumetric (per kWh) rates. The SCE rate would transition back to a traditional coincident peak demand charge (based on 15-minute maximum use per month) gradually beginning in 2024. (Non-coincident peak demand related to the cost of serving maximum demand at a specific site is not be incorporated into volumetric rates.)	Increased capacity and capability for EV infrastructure hosting
1.02	EV drivers across all sectors must be guaranteed direct access to their utilities' time-variant (e.g. TOU) rates, which are cost-competitive especially during off-peak periods, in order to both capture the value from currently "favorable" use-cases and unlock the value of currently "unfavorable" use-cases. To achieve this objective, utilities must be allowed the	**Staff does not recommend additional near-term action under the DRIVE OIR.** 1) Parties have already provided extensive comments on the reasons why the CPUC should or should not allow IOUs to own and operate transportation electrification (TE) infrastructure; or instead provide rebates for host site owned customer-side infrastructure; with regards to draft TEF section 4. The draft TEF does not propose that the ability to offer TOU rates to drivers is sufficient basis for IOU ownership of customer-side TE infrastructure.	EV drivers can expect electric vehicle charging rates to be competitive or similar to the utilities' TOU rates.

[10] Stakeholder recommended policy action descriptions and metrics have not been edited by Energy Division staff for grammar or clarity. Some final comments to the VIG Working Group regarding the descriptions may not be included.

	option to own and/or operate at least a portion of the charging stations across all sectors (e.g. residential, commercial workplace, commercial public destination, commercial public commute, MDHD), so their rates are directly available to EV drivers.	We also note that the CPUC addressed the topic of potential dissonance between a proposed IOU TOU rate for commercial electric vehicles (CEVs) and retail prices set by direct-current fast charger (DCFC) network operators in Decision D.19-10-055 which states "To that end, PG&E shall conduct a representative survey of the prices offered by DCFC operators, workplace EVSE operators, and MUD operators taking service on PG&E's CEV rates authorized by this decision. The survey results should be presented at the data collection workshop ordered later in this decision. The results of the survey may be used by the Commission in a future proceeding to determine if additional steps should be taken to address the dissonance between the CEV rates and the pricing schemes of the third party EVSE operators." [citation omitted] (p.32-4) and "Pacific Gas and Electric Company (PG&E) shall convene an informal workshop to share data CEV rate class performance no later than March 1, 2021." (p76-77)	
1.04	Establish EV TOU rates that don't require separate/submetering (significant customer cost). Allow vehicle data to be used as input to utilities for settlement to customer. Also- having a standardized TOU rate format across IOUs and other LSEs would be helpful [Staff note – LSE means load serving entity]	**Staff does not recommend additional near-term action under the DRIVE OIR.** Use of vehicle telematics for submetering could be considered in a future phase of the sub-metering protocol development. Staff notes that IOUs are currently implementing voluntary whole-house TOU rates, which is another alternative to allowing access to TOU rates for EV drivers without requiring submetering via electric vehicle supply equipment.	M&V data to demonstrate participation and compliance vs. whole home TOU [Staff note: M&V commonly refers to measurement & verification]
1.05	The pricing signal received by EV customers (drivers and/or site hosts) at any particular time of day should be relatively consistent (not necessarily identical) across different sectors and price-setting entities, to ensure effective capturing and realization of value from EV flexible load. For example, charging at 2pm within the same geographical region should not be deemed "off-peak" on one IOU rate but "partial-peak" on another IOU rate or CCA rate.	Parties may provide comments on any instances where a CCA and IOU serving the same customer have defined inconsistent peak and partial-peak periods in TOU rates. **Parties wishing to comment on rates may do so in comments on draft TEF section 9.** Staff does not have enough information to determine 1) whether any inconsistency in defining TOU time periods has occurred in practice; 2) whether the component of this proposal related to ensuring consistent IOU and CCA rates could be implemented under current rate setting criteria and the CPUC's statutory authority; 3) whether this rate structure would be in the interest of ratepayers or would enable EVs to provide benefits to the grid.	

	Harmonizing different EV rates by different entities, so they are consistent in any given time window, is important for customers to adjust their charging behavior and develop healthy, predictable, and robust charging habits. At the very least, different price-setting entities should agree on the time window where "off-peak" rates apply. [ED staff note: CCA refers to Community Choice Aggregator]		
1.06	The pricing signal received by the EV and that received by the EVSE should be aligned and consistent (not necessarily identical) with one another and should incentivize/deincentivize the same charging/discharging action, to ensure effective capturing and realization of value.	**Staff does not recommend additional near-term action under the DRIVE OIR.** Similar to recommendation 1.02, staff does not believe that the CPUC should attempt to implement this type of standardization of business models across different actors in this way at this time. This recommendation could be reconsidered in the future. Please also see 1.02 discussion regarding CPUC Decision D.19-10-055.	
1.07	Create an "EV fleet" commercial rate. Allows C&I customers to switch from a monthly demand charge to a more dynamic rate structure (e.g. average daily demand, dynamic TOU)	See 1.01 re: demand charges. Note that the draft TEF section 9 addresses rates (not specially this type of demand charge structure) and Appendix G lists current rates including current and proposed commercial rates.	Grid impacts: peak kW avoided; Program implementation: % of customers enrolled; Customer benefits: bill savings
1.08	If dynamic rate is unavailable, increase the differential between standard and EV TOU Off-peak Charging rate (delivery portion)	**Staff does not recommend additional near-term action under the DRIVE OIR.** Staff believes that the differential should be established based on the principles in the draft TEF; and **any party that agrees or disagrees may provide comments on section 9 of the draft TEF**.	Grid impacts: peak kW avoided; Program implementation: % of customers enrolled; Customer benefits: bill savings

1.09	Utility tariffs allow for customers with on-site solar and/or storage to utilize commercial EV rates. This would allow commercial customers, particularly transit agencies, to power charging with on-site solar and still take advantage of lower costs available for VGI-specific rates.	Staff understands (see comments in the VGI Working Group policy recommendations database) that the authors believe that 1) PG&E's NEM2 tariff allows commercial facilities to install PV solar power and storage for commercial EV charging sites to power EV charging and participate in the NEM tariff when solar production does not align with commercial EV charging needs, and 2) SCE's NEM2 tariff does not. **Staff suggests that parties comment on 1) whether SCE and SDG&E NEM2 tariffs or other relevant tariffs are more restrictive than PG&E NEM2 and/or other relevant tariffs in terms of allowing commercial customers with PV solar and EVs to participate in NEM tariffs; and 2) if so whether the relevant SCE and SDG&E tariffs should be revised to be consistent with the PG&E tariff and why or why not. Parties may comment on VGI topics in draft TEF section 11.1 and on rates in draft TEF section 9.**	Number of charging facilities with VGI rates that have on-site solar/storage installed
1.10	Improve Optional Residential and Commercial TOU rates designed to encourage EVs (e.g., whole house rate), fund outreach to secure 60% level of participation TOU rates designed for EVs with high levels of participation. Optional whole house TOU rates that are better for EVs and the other electricity use (in almost all cases) compared to default TOU rates; similar is true for commercial optional TOU rates; increased utility and non-utility marketing of these optional rates is needed to reach large scale VGI adoption (60% participation rate is two maybe three times current levels for option whole house rates) efforts on the rate, and set target	**Parties wishing to provide specific recommendations re: the rate design portion of this recommendations may do so in comments on draft TEF section 9, and should explain why they believe that the draft TEF should be revised to include this recommendation and why or why not. Staff suggests that parties comment on whether the CPUC should set specific TOU rate adoption targets for IOUs, and explain why or why not. Parties may also provide comments regarding marketing, education and outreach regarding draft TEF section 11.2.**	
1.11	Develop a rate design and a standard implementation guide for utilities to provide real-time price and event (control) signals to EVSEs, Charging Station	**Parties may provide comment regarding the rates section of the draft TEF (section 9) on whether the draft TEF addresses the policy recommendation, and if not what change(s) are needed and why.**	

	Management Systems (CSMSs), and EV drivers.		
1.12	Alternative Approaches to Submetering for TE in Homes. Given the many challenges faced by EV submetering over the last decade for homes, a new approach is needed. Eight years ago, when the push for submetering began, attractive time variant rates were not available for homes. Today, residential time variant rates exist and participation rates in them are increasing. As a result, the use of whole house, time variant rates and AMI meters have captured many of the proposed benefits of submetering (e.g. off-peak use of electricity). Whole house rates are applicable for all types of DERs and for DR too, and knowing which appliance provided the export or load shift is not important. The use of whole house rates and meters for all load with all DER's helps minimize costs to the utility by keeping IT processes simple, reduces duplicative networking costs by using the existing AMI meter, and reduces customer confusion and costs especially for low-income customers. Measuring carbon reduction can be done with LCFS incremental credits or other means.	Parties proposing to change the submetering protocol should provide recommendations and supporting information in the submetering venue under the DRIVE OIR.	

1.13	Retail EV charging rates should be reflective of the realistic cost of energy generation, delivery, GHG, and other relevant value streams. Unless proven necessary in select circumstances, all EV charging rates should be time-variant, starting with default TOU rates that contain three or four tiers (super-off-peak; off-peak; partial-peak; peak) to maintain simplicity, and then by enabling optional, more complex alternatives such as dynamic rates that pass through increasingly granular time- and location-specific price signals.	**ED staff does not recommend additional near-term action under the DRIVE OIR.** Staff proposed a framework to transition to default TOU rates and then optional dynamic TOU rates in draft TEF section 9. **Parties may provide comments on any section 9 regarding any changes they recommend.** Please also see 1.02 regarding CPUC Decision D.19-10-055.	EM&V to determine demonstrated benefits against TOU and/or Tiered rate baselines; Retail price of EV charging is progressively more consistent with the grid's wholesale energy prices, congestion conditions, and GHG intensity
1.15	Prompt CPUC approval of time-varying EV rates applications	**Interested parties may comment on open proceedings related to TOU rates. (note that an SDG&E application is listed under 1.01 above and Appendix G in the draft TEF).**	Percentage of EV site hosts and/or drivers served time-varying rates
1.16	Expand the definition of eligible customer-generator under current NEM tariff option to include customers that own and/or operate EVs and/or EVSE with bi-directional capabilities. In addition to an EV export bill credit (under NEM or another framework), a supplemental credit should be considered for the environmental component, such as one based on similar tools implemented for the SGIP GHG signal to determine marginal emissions rate (i.e., WattTime)	**Staff suggests that parties comment on the draft TEF sections for rates (9.1) and/or VGI (11.1) regarding whether the CPUC should direct IOUs to create a mechanism to provide value for export of electricity from electric vehicles. For instance, what option(s), if any, should be considered for providing value for exports to the grid? What method(s) should be used to determine compensation levels for exports to the grid, and why? Should the number of customers eligible for such a mechanism be limited, and if so how and why? Parties should identify the advantages and disadvantages of each potential approach and the justification for any ratepayer costs that would result from their proposal. Parties should also identify what changes are within the authority of the CPUC (and whether any existing Decision(s) would need to be changed) or would require statutory changes.** (note that this recommendation is related to 1.09 and 1.17) Staff notes that the CPUC will launch a new proceeding regarding NEM (not specific to VGI) this year.	Grid impacts: peak kW avoided; Program implementation: % of customers enrolled; Customer benefits: bill savings

1.17	Create tariffs specific to electric school buses that potentially account for V2G.	**Staff does not recommend additional near-term action under the DRIVE OIR.** Staff recommends that IOUs initially focus on broader V2G tariffs. Staff recognizes that school buses are a potentially valuable use case with distinctive characteristics (i.e. most school buses are idle during summer months) and that any specific tariff for school buses could be considered later by 2025 as recommended by the author if additional information shows the benefits of a specific approach for school buses.	Lower school utility bills; electric school bus adoption; participation in V2G activity.
1.18	Establish voluntary Critical Peak Pricing tariffs for non-residential charging that pass through reduced TOU rates except during event-based flex alert or critical peak periods, where on-peak hours pass through significantly increased prices. This could include creation of a portfolio of programs spanning a "Rush hour rewards"-style peak time rebate incentive program for EV owners/fleets/EVSPs who respond to utility signal to limit charging during critical peak periods, or a Public Charging incentive/payment or future free charging session for customers that agree to not to charge during critical peak periods.	**Staff suggests that parties comment on whether the CPUC should direct IOUs to evaluate a "partially dynamic" rate focused on critical peak periods. Parties are encouraged to address 1) whether this approach would lead to greater adoption of a dynamic (though not fully dynamic) rate compared to fully dynamic rates; and if so why; and 2) the relative benefits compared to a fully dynamic rate. Parties wishing to comment on rates may do so in comments on draft TEF section 9.** The author of this policy recommendation cited the following paper regarding similar programs for thermostats as a precedent to apply this program to EV charging. https://www.peakload.org/assets/Groupsdocs/PractitionerPerspectives-UtilityBYOTPrograms-022818-Final.pdf Staff notes that this recommendation could also be considered during design of demand response programs by IOUs and/or third parties.	Grid impacts: peak kW avoided; Program implementation: % of customers enrolled; Customer benefits: value of revenue to customers
2.01	Require utilities to broadcast signals to a DER marketplace of qualified vendors (curtailment and load)	2.01 and 2.07 are not currently addressed by any existing CPUC proceeding identified by staff (note that they are potentially related to 3.03, and 3.04)	Capacity fulfilment per call
2.02	V2G systems become eligible for some form of SGIP incentives. One or several budget categories for V2G systems could be established along with residential, commercial, equity, etc. Large scale, commercial pilots could be used to develop the program.	An Administrative Law Judge email ruling was issued on July 17, 2020 regarding the pre-hearing conference in R.20-05-012 on July 29, 2020. The ruling included the topic of whether to exclude "Consideration of Electric Vehicles (EV) or EV supply equipment as eligible technologies, beyond existing SGIP processes."	See VGI WG policy recommendations database

2.03	Establish "reverse EE" rebates (pay for performance?) for EVSE installations that build permanent midday load	**Staff does not recommend additional near-term action under the DRIVE OIR.** Staff recommends focusing in the near term on incentives such as TOU and dynamic TOU rates listed in draft TEF section 9 that support both this use case, i.e. uptake of mid-day solar, as well as other use cases such as night-time wind and discharge during periods of peak demand. This recommendation could be reconsidered later.	EM&V to determine demonstrated benefits w/r/t negative price abatement, avoided renewables curtailment, and maximizing GHG reduction vis-à-vis gasoline
2.04	Enable customers to elect BTM load balancing option to avoid primary or secondary upgrades, either if residential R15/16 exemption goes away, or as an option for non-residential customers	**Staff suggests that parties comment on the following topics (regarding section 11.1 of the draft TEF) 1) whether IOUs consider an EV energy management system (EMS) when determining the need for a utility service connection upgrade; or instead sum the maximum nameplate capacity load from each EVSE without considering the EMS (and whether the process set by IOUs for customers that install new load varies based on whether the capacity of the host site's main breakers is increased); 2) whether any barriers would prevent IOUs from offering this technology to participants in existing and future IOU TE infrastructure programs as a "non-wires" alternative to physical upgrades (where otherwise required) to IOU and customer-side electrical capacity; 3) what information and/or demonstrations are needed to evaluate the potential to use EV EMS to manage concentrated loads, such as MD/HD load, to avoid a utility distribution system transformer or feeder upgrade; and 4) other potential barriers and opportunities for EV EMS** (same for 2.04/2.17/2.18/2.22, which address one or more of these potential EV EMS applications).	Avoidance of reliability events / outages as a result of load balancing
2.05	Require managed charging capability in utility customer programs, incentives, and DER procurements.	This topic was addressed in draft TEF section 8.1 and the comment deadline has passed. Staff notes that VGI WG stakeholders comments include consideration of cost vs. benefits; and that IOUs have separately noted that retrofitting communications capabilities into underground parking can be very expensive. A stakeholder questioned during the VGI WG vetting of recommendations whether this capability should be required across the board when some host sites do not intend to participate in VGI programs.	Participation in customer programs.

2.07	Create a strategic demand reduction performance incentive mechanism, include EVs as technology that can reduce and shift peak demand.	2.01 and 2.07 are not currently addressed by any existing proceeding identified by staff (note that they are potentially related to 3.03, and 3.04)	Implementation of an incentive; actual reductions; avoided costs; measurement by IOUs and CPUC; peak demand reduction.
2.08	The CPUC and CEC should consider coordinated utility and CCA incentives for EVs, solar PV, inverters, battery energy storage, capacity, including panel upgrades, and EV charging infrastructure to support resilience efforts in communities impacted by PSPS events. Coordinated incentives should be designed with resilience and equity in mind, providing the benefits of these technologies to customers directly impacted by PSPS events, as well as CARE/FERA, medical baseline, and/or low-income customers.	Interested parties may participate in the microgrids phase 2 proceeding. The microgrids proceeding (R19-09-009) phase 2 ruling requests comment including staff proposal 4 - IOU microgrid incentives. We note that other programs/proceedings related to renewable energy, TE infrastructure, and energy storage may also be relevant. Parties may also comment on any policies in the draft TEF that are open for comments and related to this recommendation.	Number of utilities that offer "microgrid" incentives; LSEs serving PSPS prone areas offer incentives; customer adoption of clean back-up power (vs. dirty generator).
2.09	Leverage existing pilots in the state to identify major bottlenecks for increasing deployment and reducing costs. Encourage utilities, in partnership with private entities, to establish dedicated programs or sub-programs (under MDHD) for School Bus charging solutions	**Staff does not recommend additional near-term action under the DRIVE OIR.** This topic is relevant for IOU MD/HD programs; however IOUs can already support school buses and no specific action items were identified in this recommendation (see the VGI Working Group policy recommendations database). Interested parties can comment on EPIC, IOU TE applications and other relevant proceedings during open comment periods to recommend specific action items and provide supporting information.	
2.11	Create an EV Dealership VGI upfront incentive program whereby utilities can reward dealers for installing or enabling VGI functionality at point of sale. Examples could range from simple to complex: --Charge timer setting + EV TOU sign up (simple) --Service reminder for future charge timer period adjustments (less simple) --Real-time charging settings, with $/MWh thresholds (more advanced) --Voltage control (even more advanced,	**Staff suggests that parties comment on the appropriate process to further evaluate these recommendations**. The author notes that this recommendation could be addressed through IOU TE programs; and/or through demand response programs. Draft TEF chapter 11 addresses education and outreach but does not specifically address how to evaluate a potential upfront cash incentive to dealers; or for preprogrammed EVSE.	Grid impacts: peak kW avoided; Program implementation: % of customers enrolled; Customer benefits: bill savings

	enhanced by V2G) --Discounted/rebated home L2 chargers if preprogrammed for defined VGI services (could be cofounded by utility & third party EVSP providers)		
2.12	Allow V1G and V2G to qualify for SGIP to level the playing field with other DERs. An interim step would be for SGIP to fund pilots in various and other LSEs market segments in order to test different incentive payments for V1G and V2G	An Administrative Law Judge email ruling was issued on July 17, 2020 regarding the pre-hearing conference in R.20-05-012 that is to occur on July 29, 2020. The ruling included the topic of whether to exclude "Consideration of Electric Vehicles (EV) or EV supply equipment as eligible technologies, beyond existing SGIP processes"	
2.13	Allow V1G (Smart Charging/Managed Charging) to be counted as storage for Storage Mandate	The current storage mandate is close to completion and staff has not identified a current venue to consider this recommendation.	Number and size of V1G programs. V1G programs support State goals (e.g. RE integration/"Duck Curve Management")
2.14	Prioritize and properly document and implement one or more of the cost-effective use-cases for every transportation electrification plan, project, or program that (1) is supported or subsidized by public funds; (2) is applied at commercial scale (200+ EVs or 100+ EVSEs); and (3) is to be deployed in the next 1-5 years. Every TE program or project meeting the three criteria above must include the deployment of one or more cost-effective VGI use-cases.	**Staff does not recommend additional near-term action under the DRIVE OIR.** Staff does not agree that plans, projects, and programs should be constrained to use-cases that are determined to be cost-effective. The VGI WG often lacked sufficient data to determine which use cases are cost-effective; and some projects are aimed at moving use cases to the point where they are cost-effective**.**	Track the total number of use-cases that are being implemented within publicly funded TE programs and projects in California
2.15	Incentive(s) for construction projects with coincident grid interconnection and EV infrastructure upgrade	**Staff has proposed in section 10.2 of the draft TEF that IOUs support expansion of CALGreen codes for both new construction - when interconnection would be required for the new building project - and for renovations/expansions of existing buildings that could also require interconnection. Please see recommendation 9.01.** (see also recommendations 8.01, 11.05 and 9.01)	Increased charging infrastructure with facility retrofit/upgrade projects

2.17	Enable customers, via Rules 15/16 or any new tariff for EV make-ready infrastructure, to elect certified behind the meter load management technologies to avoid primary and / or secondary upgrades, and make the Point of Common Coupling the focus of capacity assessments rather than the aggregate capacity of individual behind the meter assets such as EVSEs and other DERs. Behind the meter load management systems are proven, UL-certified and NEC-approved solutions that will significantly reduce net economic costs avoiding unnecessary distribution system upgrades. This policy recommendation should ultimately be applied on a technology agnostic basis, but VGI-based upgrade avoidance is a relevant near-term use case that can be implemented as an option for utility EV infrastructure investments.	see 2.04	Higher utilization rates of individual customer connection capacity; avoidance of reliability events; agreement among AHJs that noted UL standards are valid to fulfill NEC 625.4 Automated Load Management Controller definition
2.18	Incentivize multiple EVs using a single charging station (e.g., chargers that power share / sequence) to keep charging load spread across as many vehicles as possible.	see 2.04	
2.19	Site higher level kW charging for commercial applications in the best locations to encourage high utilization	Staff does not believe that this recommendation is relevant to the VGI section (11.1) of the draft TEF.	
2.20	Consider funding opportunities and rate design reform for stationary batteries co-located with DC fast chargers (DCFC) to reap grid benefits and potentially improve economics of near-term DCFC installations with low utilization.	See 1.01 and 1.07 for rate-related aspects. Parties may comment in response to proceedings that they consider relevant regarding IOU funding opportunities for battery storage to support DC FC, including whether this recommendation is related to sections of the draft TEF that are open for public comments.	Upgrades associated with installation decreased, demand charges mitigated after end of 5 year special EV rate currently under consideration, utilities allowed appropriate cost recovery for assessed load considering storage

2.21	Public charger ancillary services program: --Provide a performance-based incentive for building owners, or EVSP providers, who recruit a certain fraction of EV drivers to opt in to allowing their EV to temporarily provide grid services (e.g. regulation) while parked. --Long-term contract through procurement	Parties may provide comments related to any sections of the draft TEF that are open for public comments and are relevant to this idea and/or other venues that they consider appropriate.	Grid impacts: MW of AS delivered
2.22	Non-wires alternative competitive procurement issued (RFO) targeted to EVs/EVSPs that can limit demand during peak times	see 2.04	kW utility service upgrades avoided
3.07	Coordinated effort by state agencies and IOUs and other LSEs to establish market rules and participation options for separately metered V2G customers. Take learnings from existing V2G and other DER pilots and demonstration projects to establish market rules and new utility billing mechanisms that would allow for customers/aggregators to access wholesale market and Resource Adequacy revenues that are unavailable today for any grid exports. Pilot additional demonstration projects to the extent they will result in lasting operational/accounting standards. This will ultimately need to be addressed in CPUC proceedings, likely a new MUA proceeding focused on specific actionable accounting rules rather than the general guidelines that currently exist.	**Parties may comment on draft TEF VGI section 11.1 regarding IOU actions needed to open wholesale markets to VGI that should be coordinated through the DRIVE OIR**. We note that the author also identified a number of other potential venues to advance this recommendation, including CAISO.	RA from V2G, amount of V2G participating in CAISO markets, equivalent storage capacity provided by V2G, energy arbitrage from V2G

4.03	Explore long-term solutions to mitigate the impact of high kW (10-19 kW) charging in residences as this has disproportionate grid impacts	**Staff does not recommend additional near-term action under the DRIVE OIR.** Staff believes that other broader solutions to mitigate the impacts of EV charging are a more immediate priority. This topic could be reevaluated in the future based on addition experience if this type of charging becomes more common.	
4.04	Perform detailed cost-effectiveness analysis for specific VGI use-cases in programs/measures that are ratepayer funded, in order to quantify the impact on EV customer, ratepayer, utility, and society at large. Important considerations to guide the implementation of this task include: (1) Cost-effectiveness valuation should include use-cases under both Direct and Indirect approaches. (2) For every use-case: Parties that scored the said use-case as "favorable" are strongly encouraged to support in the detailed cost-effectiveness analysis (while mindful of anti-trust concerns); not providing such support may risk de-favoring and therefore de-prioritizing the said use-case. (3) The VGI cost-effectiveness valuation methodology should be consistent and aligned with the any cost-effectiveness valuation methodology applied to the larger context of TE programs as a whole; VGI measures should not be evaluated in isolation. (4) consider existing cost-effectiveness metrics such as Avoided Cost Calculator and Ratepayer Impact Measure (RIM). (5) ensure only incremental costs of VGI measures are considered.	**Staff suggests that parties address whether to include this requirement in comments on draft TEF VGI section 11.1, and if so, how this analysis would be conducted and why. If parties believe it should be included in IOU programs authorized under the TEF, staff encourages comments on how IOUs would collect the relevant cost and benefit data and whether to include in the proposed scorecards or in some other way.** We note that VGI Working Group stakeholders commented during informal discussions that the VGI market is generally not sufficiently mature to apply the type of cost-effectiveness metrics applied to some other IOU programs.	Publicly available database of cost-effectiveness of VGI use-cases, similar to the Avoided Cost Calculator

4.06	Large Scale VGI Demonstrations, Data Programs, and Studies Need to be Funded: CalETC's proposal to the CEC to use EPIC funds for an on-going program to convene VGI data experts on a wide array of topics	Stakeholder recommendations 4.06, 6.07, 7.03, 7.04, 7.05, 7.07, 7.09, 7.11 and 7.14 address EPIC. CEC-funding for EPIC projects is currently approved by the CPUC and administered by the CEC, which issues specific requirements for funding solicitations. The assigned Administrative Law Judge released a proposed decision (PD) authorizing continued EPIC funding from 2021-2030 on July 22 under R1910005. The PD also contains a schedule for comments on Phase 2 to focus on administrative and project evaluation improvements. The schedule for opening comments on Phase 2 was not determined as of 7/28/2020. (Note: many demonstrations list the CEC as the lead and CPUC as the secondary lead except that 6.07 lists the CPUC as the lead, and not every stakeholder recommendation lists a lead agency.)	
5.01	Bring automakers to the table to agree to allow limited discharge activity for resilience purposes to be kept under warranty if customers are willing to pay for upgraded bi-directional charging hardware.	**Staff does not recommend additional near-term action under the DRIVE OIR.** This recommendation could be reconsidered later if market forces do not result in automakers allowing this VGI use case under warrantee. Staff notes that the CPUC does not have authority to regulate automaker warrantee policies.	Number of automakers that allow small amounts of discharge activity under battery warranty; widespread customer ability to discharge battery to home in PSPS event.
5.02	Pilot funding for EV backup power to customers not on microgrids. This includes: (1) Set a state goal (floor) of having EVs providing emergency backup generation during PSPS events: At least 100 EVs by mid 2021 and at least 500 EVs by mid 2022. This could be implemented as one pilot or a portfolio of pilots across California. (2) Utilities to consider the feasibility of EVs for emergency backup generation as part of their PSPS plans and resiliency solutions over the next 2-3 years. Per Recommendation 1, cost-effectiveness shall continue to be a major criteria for evaluating the feasibility of EVs for backup generation.	An Administrative Law Judge email ruling was issued on July 17, 2020 regarding the pre-hearing conference in R.20-05-012 (SGIP) on July 29, 2020. The ruling included the topic of whether to exclude "Consideration of Electric Vehicles (EV) or EV supply equipment as eligible technologies, beyond existing SGIP processes" We understand that several manufacturers intend to introduce EVSE with this capability into the market in the near future. Interested parties may also wish to read the CPUC's Decision D.20-05-051 under the Public Safety Power Shutoff (PSPS) OIR (R.18-12-005).	

6.03	Explicitly prioritize these use-cases to be included in the next cycle of PRP submissions by one or more of the IOUs and other LSEs, as well in the next phase of EPIC funding.	**Staff does not recommend additional near-term action under the DRIVE OIR. Parties may comment on this topic regarding VGI section 11.1 of the draft TEF if they disagree with staff**; and may comment on individual IOU TE applications when they are filed. Staff recognizes the value of developing the V2G school bus use cases identified by the author but do not have information to justify ordering IOUs to prioritize these use cases ahead of others. IOUs and other load serving entities LSEs may consider prioritizing these use cases. See 4.06 re: EPIC.	
6.04	Drastically simplify NEM tariffs and streamline NEM applications for EVs; explore possibility for (simplified) NEM tariff specifically for EVs, in order to both capture the value from currently "favorable" use-cases and unlock the value of currently "unfavorable" use-cases. Along the same lines, strongly encourage better communication of EV TOU and NEM rates to the general public and other business entities.	**See 1.16 regarding availability of NEM tariffs for vehicle export of power to the grid. Staff suggests that parties comment on draft TEF section 9 regarding rates for power exported from vehicles to the grid or draft TEF section 11.1 VGI on whether IOUs should simplify other aspects of NEM tariffs for EVs and if so how and why.** Please see recommendation 9.02/9.03 for staff feedback regarding market education & outreach.	

6.07	Pilot funding for V1G / V2G for microgrid / V2M solutions. This includes: (1) Set a state goal (floor) of having 10 MW of EVs providing grid services to microgrids, including energy supply, capacity, or others services, in the near-term. One area of consideration would be to test an EV-powered microgrid at community centers in vulnerable communities. (2) Utilities should consider the feasibility of EVs for FTM grid services as part of their PSPS plans and microgrid frameworks.	Interested parties may comment in the following venues: 1) CPUC Energy Division Microgrids Rulemaking 19-09-009 July 23, 2020 Ruling. (We note that Staff Proposal 4 "Direct Utilities to Develop a Microgrid Pilot Program" states that "Technology performance criteria: … Must be able to support multiple loads and meters. Although back up for a single-meter service is not the target, single-meter service may be eligible" p.19. In addition, Proposal 2 could allow transfer of power from one customer to an adjacent "critical customer" during a utility service outage.) 2) An Administrative Law Judge email ruling was issued on July 17, 2020 regarding the pre-hearing conference in SGIP R.20-05-012 on July 29, 2020. The ruling included the topic of whether to exclude "Consideration of Electric Vehicles (EV) or EV supply equipment as eligible technologies, beyond existing SGIP processes." 3) See 4.06 regarding EPIC.	Progress towards goal of 10 MW of EV microgrid capacity; # VGI assets responding when called and maintaining reliability / keeping the lights on in a PSPS event
7.01	Dedicate specific efforts that allow TNC/Rideshare drivers to reduce their costs by benefiting from utility and other publicly-funded programs and rates, in order to both capture the value from currently "favorable" use-cases and unlock the value of currently "unfavorable" use-cases. This includes, but is not limited to: (1) a clear pathway for TNC/Rideshare to participate in utility programs for commercial charging (DCFC and L2) and to benefit from make-ready infrastructure and charger rebates, including an option for dedicated or semi-dedicated (during specific periods of the day) chargers; (2) a clear pathway for TNC/Rideshare to participate in state-funded programs like CaleVIP; (3) guaranteeing direct access to utility rates for TNC/Rideshare drivers	**1) Parties may comment on section 12.1 of draft TEF section regarding TNCs** including any barriers that TNCs currently face for participation in IOU programs, and what specific changes they would recommend and why. Staff noted in the draft TEF section 11 that TNCs are currently utilizing public DC FC extensively. 2) CaleVIP is administered by the CEC. 3) See 1.02 regarding guaranteeing access to utility rates.	

	reliant on public charging, per Recommendation 11.0		
7.03	Leverage EPIC funding to pilot some use-cases in order to: (1) better understand realistic costs and implementation challenges; (2) identify concrete ways to reduce cost and streamline implementability. The pilots would cover both sectors Workplace and MUD. Among other activities: strongly endorse the "Distributed Energy Resource Solutions for Medium- and Heavy-Duty Electric Vehicle Charging" initiative launched by the CEC.	See 4.06 regarding EPIC.	
7.04	Create pilots to demonstrate V2G's ability to provide the same energy storage services as stationary systems. Additionally, let V2G systems participate in pilots for stationary energy storage. These pilots would utilize, commercially deployed V2G systems - see "Group A" use cases in recommendation #1.0 The purpose of the pilots is test V2G effectiveness in performing grid applications which are not currently accessible. These new "stackable" applications would be added to and complement base applications such as customer bill management which are accessible today.	See 4.06 regarding EPIC. **Parties may comment regarding the VGI section 11.1 of the draft TEF if they believe that this recommendation should be addressed in the final TEF decision in some way, and if so how and why.**	Number of economically viable, accessible grid applications available to V2G systems
7.05	Special programs and pilots for Municipal fleets to pilot V2G as mobile resiliency. V2G has particular value for municipal fleets as a mobile, resiliency response asset. This includes resiliency use cases and other use cases not contemplated in this work group such as ones related to disasters and emergencies. These could be piloted in a similar context as described in recommendation #2.	See 4.06 regarding EPIC. **Parties may comment regarding the VGI section 11.1 of the draft TEF if they believe that this recommendation should be addressed in the final TEF decision in some way, and if so how and why.**	V2G system in municipal fleets

7.07	Develop a demonstration pilot that defines a means, based on existing open standards, that allows Aggregators, EV Network Providers and Charge Station Operators to dynamically map the capacity and availability of EVSE resources to local coordination areas – from transformer to feeder to substation.	See 4.06 regarding EPIC. **Parties may comment regarding the VGI section 11.1 of the draft TEF if they believe that this recommendation should be addressed in the final TEF decision in some way, and if so how and why.**	
7.09	Large Scale Demonstrations, Data Programs, and Studies Need to be Funded: CalETC's VGI Acceleration proposal to CEC to fund California agencies to select many promising complex VGI use cases for large scale demonstrations that will accelerate adoption and help automakers and charging networks make business decisions to commercialize VGI	See 4.06 regarding EPIC. **Parties may comment regarding the VGI section 11.1 of the draft TEF if they believe that this recommendation should be addressed in the final TEF decision in some way, and if so how and why.**	
7.11	Large Scale Demonstrations, Data Programs, and Studies Need to be Funded: study to understand of the impact on the grid from TE in out to 2040	See 4.06 regarding EPIC.	
7.13	Create a mechanism which allows for quick approval of demonstrations for technology and to determine market interest	Staff proposed that IOUs adopt an Emerging Technology program in the draft TEF (section 8.5). **Staff suggests that parties comment, in response to VGI section 11.1 of the draft TEF, on whether the scope of an Emerging Technology program (if adopted in a final CPUC decision on the TEF) should include these types of VGI demonstrations and market support, and if so what type of budget is appropriate for these activities and why**. (Parties can cross-reference and should not repeat comments on section 8.5)	Take a demo and test proposal from idea to execution in 2 quarters
7.14	Increased pilots exploring shared charging infrastructure for commuter-based fleets, both public and private. This should include medium distance transit commuter buses that operate in morning and afternoon/evening as well as the growing fleet of tech company and other corporate shuttles. Pilots should include	See 4.06 regarding EPIC.	kWh shifted, GHG emissions saved, curtailment avoided, charger cost savings

	provisions for managed charging and potential provision of market services and V2G.		
8.01	Incentives for Title 24 new construction -- MUDs and some C&I (especially workplace and large destination) parking facilities	See 9.01 regarding CALGreen. We also note that the draft TEF section 5.5 proposed new construction incentives; the deadline for party comments on this section of the draft TEF has passed. (note that VGI WG recommendations 8.01 and 11.05 are similar recommendations for different types of parking facilities.)	Increased charging infrastructure at MUDs and residential
8.02	Finalize submetering protocols/standards to increase accessibility to more favorable EV TOU rates.	Sub-metering protocols are currently being considered in the DRIVE OIR.	Sub-meters utilized, number of customers with access to commercial EV rates
9.01	Optimize CALGreen codes for VGI and revise to require more PEV-ready parking spaces and expand to existing buildings. For buildings that go significantly above the requirements, incentives can be made available, similar to the California Advanced Homes Partnership.	Staff proposed in section 10.2 of the draft TEF that IOUs support state agencies developing CALGreen updates. Staff **suggests that parties comment on whether IOUs should support CALGreen updates as proposed in the draft TEF and whether IOU support is needed for any research or analysis on whether technical standards revisions would optimize these codes to support VGI.**	Reduced cost per charger; Increased charging infrastructure at MUDs and residential; Fraction of chargers in new buildings that have smart charging. Meeting state goals for EV infrastructure.
9.03	Through TE plans, utilities develop coordinated ME&O budgets to inform EV customers of the lower cost of fueling EVs using dynamic rate options and other VGI opportunities. This ME&O for VGI ramps up in tandem with overall TE efforts.	**Staff suggests that parties comment on draft TEF section 11.2, Marketing Education & Outreach (ME&O) to 1) identify potential budget ranges for VGI-related ME&O and explain why; 2) identify examples of effective VGI ME&O strategies and/or research needed to determine appropriate strategies; and 3) explain the potential role(s) for IOUs in these efforts and why the IOU role(s) is appropriate.**	Increased awareness, determined through customer awareness and satisfaction surveys, by the general public of VGI and its benefits to individual consumers, including benefits such as GHG reduction.

10.01	Helping the state meet federal air quality requirements and the state's 2045 carbon neutrality requirement is a top-level need and VGI is a secondary goal that should be used to help achieve these primary goals. Similarly TE and related infrastructure must be optimized for the primary purpose of providing transportation and VGI solutions ought to be designed to satisfy that primary purpose	Staff agrees with the goal of achieving air quality requirements and climate goals and the importance of TE adoption to meet these goals. These goals are established in existing legislation.	
10.02	Use the proposed Joint IOU VGI Valuation Framework (6 dimensions) and associated use-cases to reference, articulate, and communicate about VGI in policymaking across CA state agencies. The 6 dimensions (Sector, Application, Type, Approach, Resource Alignment, and Technology) can be used as a starting point to reference specific VGI use-cases, with additional details added as necessary. Specifically, strong recommendation to use the Joint IOU VGI Valuation Framework as the foundational framework for VGI in the Transportation Electrification Framework under the DRIVE OIR.	The draft TEF section VGI section 11.1 does not address specific use cases. **Parties may comment on how discussion of specific use cases is necessary to meet VGI goals in comments on the VGI section (11.1) of the draft TEF.**	
10.04	State agencies coordinate and maintain consistency across the different policy forums (see CalETC letter) and state policy goals	Staff will continue to coordinate with other state agencies.	

11.01	Reduce or eliminate demand charges for DCFC, but scale up with utilization to create more demand-responsive rate.	PG&E and SCE tariffs waive peak demand charges on a permanent or temporary basis but not co-coincident demand. **Parties may comment on draft TEF section 9 regarding rates regarding whether they believe that any change is needed.** (Note: see 1.01 and 1.07 regarding stakeholder recommendations on converting coincident monthly demand changes into more flexible policies.	DCFC installs; DCFC utilization; managed charging benefits.
11.03	Permit streamlining	Staff recognizes that some building officials have limited knowledge of VGI technologies and practices, which could create barriers to local government permitting of VGI solutions. **Staff suggests that parties comment on draft TEF section 10.3 (partnerships) regarding what, if any, IOU activities should support local permitting (such as creation and/or presentation of technical resources regarding VGI) and why. Staff believes that any potential IOU role would require carefully coordinated to avoid overlaps with 1) current efforts by the Governor's Office of Business Development (GO-Biz), 2) efforts by those CCAs that are currently working with local building officials, 3) and any future CEC grant funding for this activity.** (CEC has previously provided funding through EV-readiness grants).	Permits that get processed vs permits denied Processing time
11.04	Investigate ADA and other obstacles to charger installation at MUDs and some high density C&I locations	**Staff does not recommend additional near-term action under the DRIVE OIR.** The California Division of the State Architect is the lead state agency writing these regulations, which are implemented by local jurisdictions. **Parties that recommend a specific action for IOUs could comment on draft section 10 of the TEF, Partnerships to identify what IOU role is necessary and why**.	Uptake of MUDs in IOUs programs, e.g., >10%
11.05	Incentives for new construction -- public parking lot projects	see 8.01	Increased charging infrastructure at public parking lots

APPENDIX C

Project Name (Acronym)	Description	Vehicle Sector	Funding Source
School Bus Replacement Program	Grant solicitation that offers funds to replace old diesel school buses with electric buses capable of Vehicle to Grid in disadvantaged and low-income communities throughout California	HD	CTP
California Electric Vehicle Infrastructure Project (CALeVIP)	Block grant that releases multiple regional incentive projects that offer rebate funding for Level 2 and DC fast charging deployments	LD	CTP
BESTFIT Innovative Charging Solutions (BESTFIT)	Grant solicitation covering all vehicle sectors to fund innovative charging solutions that 1) increase utilization of charging infrastructure, 2) minimize purchase, operation, and/or installation costs, 3) advance the customer interface	LD, MD, HD	CTP
Vehicle-Grid Innovation Lab (ViGIL)	Grant solicitation to increase the capacity and competitiveness of the market for electric vehicle supply equipment standards testing (for all vehicle sectors)	LD, MD, HD	CTP
Block Grant for Medium-Duty and Heavy-Duty Zero-Emission Vehicle Refueling Infrastructure Incentive Projects	Competitive block grant to design and implement up to $50 million in grant funds for various medium- and heavy-duty zero-emission vehicle refueling infrastructure incentive projects throughout California	MD, HD	CTP
Zero-Emission Transit Fleet Infrastructure Deployment	Grant solicitation to fund the electric vehicle charging or hydrogen-refueling infrastructure needed to support the large-scale conversion of transit bus fleets to zero-emission vehicles at multiple transit agencies serving diverse geographic regions and populations	MD, HD	CTP

Evaluating Bi-Directional Energy Transfers and Distributed Energy Resource Integration for Medium- and Heavy-Duty Fleet Electrification	Grant solicitation focused on advancing technologies and commercial offerings for realizing cost management, renewable integration, and resilience use cases of medium and heavy-duty vehicle electrification and distributed energy resources. Group 1) bi-directional charging systems for electric school buses; Group 2) Distributed energy resource packages for medium and heavy-duty fleet charging; and Group 3) Integrated distributed energy resources packages for electric school bus charging	MD, HD	EPIC
Research Hub for Electric Technologies in Truck Applications (RHETTA)	Grant solicitation focused on charging technologies and strategies for electrification of heavy duty trucks in drayage operations in a highly trafficked freight corridor, including advanced charging hardware development and deployment with distributed energy resources and VGI strategies to manage charging load and mitigate grid impact	MD, HD	EPIC

Acronyms

Light Duty (LD), Medium Duty (MD), Heavy Duty (HD)
Clean Transportation Program (CTP)
Electric Program Investment Charge (EPIC) Program

APPENDIX D

PACIFIC GAS AND ELECTRIC COMPANY
Electric Vehicle Infrastructure OIR
Rulemaking 18-12-006
Data Response

PG&E Data Request No.:	ED_017-Q01		
PG&E File Name:	ElectricVehicleInfrastructure_DR_ED_017-Q01		
Request Date:	September 30, 2020	Requester DR No.:	017
Date Sent:	October 13, 2020	Requesting Party:	Energy Division
PG&E Witness:	Lydia Krefta	Requester:	Ed Pike

SUBJECT: PG&ES USE OF EV EMS IN YOUR TRANSPORTATION ELECTRIFICATION INFRASTRUCTURE PROGRAMS

QUESTION 01

Could you please let me know the status on those installations, and whether you are focusing on any particular type(s) of customers?

ANSWER 01

PG&E EVCN Projects - Load Management Experiences

Below is a table of the EVCN projects that use load management as part of the project deployment.

Project Number	Location Type	No. of Ports	Panel Size Installed (Amps)	Load Management (% of full load)
1	MUD	98	*98 ports split 49 / 49 across 2 panels*	
		49	400	47%
		49	400	47%
2	MUD	206	*206 ports split 107 / 48 / 51 across 3 panels*	
		107	800	43%
		48	400	48%
		51	400	45%
3	MUD	106	1000	51%
4	MUD	163	1200	43%
5	MUD	135	600	56%
6	MUD	38	400	61%
7	Workplace	49	800	88%
8	Workplace	80	1000	72%
9	Workplace	90	1000	64%
10	Workplace	50	800	87%
11	Workplace	20	600	94%
12	Workplace	48	800	90%
13	Workplace	22	400	99%
14	Workplace	50	800	87%
15	Workplace	34	600	96%
16	Workplace	50	800	92%
17	MUD	22	400	99%
18	MUD	53	800	87%
19	Workplace	25	400	87%

Benefits of Using Load Management:

- Cost savings:
  - Can use a smaller size of panel and service.
  - Saving ranges from $30K to $200K per project
- Space saving / can overcome physical constraints:
  - The physical size of the panel will be smaller. For example, the 800A panel will be taller and wider than the 600A panel.
    - 600A Panel: 36”X24”X54” (width, depth, height)
    - 800A Panel: 68”X24”X78” (width, depth, height)
  - A few projects are infeasible if load management is not used, due to the physical constraints of the site. For example, site #1 has no physical space available to house a larger sized transformer, meter, and distribution panels.

Case Study and Scenarios:

1. ***Minimal Load Management***
   The projects highlighted in yellow implemented minimal load management and are a mix of MUD and workplace. As an example, Project #7 has 49 chargers and it is setup for 88% load management. Each charger normally draws 32A (or 6.6 kW). If 43 or less chargers are used simultaneously, each of the 43 chargers will receive its full 32A. If all 49 chargers are used at the same time simultaneously, each of the 49 chargers will then receive 28A (88% of its full power). It typically takes ~2 hours to provide 50 miles of charging range under the full 32A of power. If all 49 chargers are used (28A is provided), the electric vehicle will then need about 2 hours and 16 minutes to get 50 miles of charging range.

2. ***50% Load Management for MUD***
   The projects highlighted in green are at multi-unit dwelling (MUD) complexes and implement ~50% load management. MUD customers typically charge their electrical vehicles overnight from 11 pm to 7 am. For these customers, under a scenario where all the EV chargers are used during the 11 pm and 7 am timeframe, each charger will receive ~50% of its full power and it will take **4 hours** instead of 2 hours to provide 50 miles of charging range. Even with the 50% power, all the electric vehicles will be fully charged before dawn. In addition, it is expected that most of the charging sessions will end after few hours for most of the electric vehicles. The charger will have its full 100% power for the last few hours before dawn.

For all the projects that are using load management, we work with the site host to develop the load management plan at the beginning of the project. Load management is typically provided by the EVSP. We have successfully implemented load management with ChargePoint, EV Box/Greenlots and PowerFlex/Webasto.