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

| | |
|---|---|
| Application of Southern California Edison Company (U 338-E) to Establish Marginal Costs, Allocate Revenues, and Design Rates. | Application 24-03-019<br>(Filed March 29, 2024) |

# REPLY BRIEF OF THE VEHICLE-GRID INTEGRATION COUNCIL

Zach Woogen
Executive Director
Vehicle-Grid Integration Council
1401 21st St., Suite 5409
Sacramento, California 95811
Telephone: (510) 665-7811
Email: vgicregulatory@vgicouncil.org

Grace Pratt
Caliber Strategies
801 K Street, Suite 2800
Sacramento, CA 95814
Telephone: (818) 264-6437
Email: grace@caliberstrat.com

Date: November 24, 2025

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

| | |
|---|---|
| Application of Southern California Edison Company (U 338-E) to Establish Marginal Costs, Allocate Revenues, and Design Rates. | Application 24-03-019<br>(Filed March 29, 2024) |

## REPLY BRIEF OF THE VEHICLE-GRID INTEGRATION COUNCIL

Pursuant to Rule 13.1 of the Rules of Practice and Procedure of the California Public Utilities Commission ("Commission") and the *E-Mail Ruling Setting Briefing Schedule and Granting Motion for Party Status* issued on October 3, 2025, the Vehicle-Grid Integration Council ("VGIC") hereby submits this Reply Brief on the *Application of Southern California Edison Company (U 338-E) to Establish Marginal Costs, Allocate Revenues, and Design Rates*.

## I. INTRODUCTION.

VGIC appreciates the opportunity to submit this reply brief to address comments made by the Public Advocates Office at the California Public Utilities Commission ("Cal Advocates") on the Vehicle-to-Grid Resource Proposal ("VGRP"). VGRP is addressed in the Vehicle to Grid Rate Proposal Settlement Agreement ("Settlement Agreement"), which was agreed to by Southern California Edison Company ("SCE"), CALSTART, Inc., Small Business Utility Advocates ("SBUA"), Solar Energy Industries Association ("SEIA"), and VGIC (jointly as the "Joint Settling Parties"). VGIC supports the VGRP Settlement agreement and recommends that the Commission approve the settlement as consistent with the law, reasonable in light of the whole record, and in the public interest.

## II. VGRP SHOULD BE ADOPTED AND CAL ADVOCATES COMMENTS ON THE AVOIDED COST CALCULATOR SHOULD BE DISMISSED.

In Opening Briefs, Cal Advocates submitted comments on VGRP largely re-iterating previous comments they submitted on the original VGRP Settlement Agreement on October 6, 2025.[1] In both the comments on the settlement agreement and in Opening Briefs, Cal Advocates is mainly opposed to the use of the Avoided Cost Calculator (ACC) to set the export rate.

In reply to Cal Advocates' October 6 comments on the settlement agreement, the Joint Settling Parties clearly outlined why it is reasonable for VGRP to use the ACC to set export compensation rates:[2]

- **Use of the ACC in VGRP is consistent with Commission precedent regarding export compensation:** The Commission has adopted the ACC to set export compensation in the Net Billing Tariff (NBT) and has stated that "the calculator has consistently reflected the value of exported energy from year to year."[3]
- **VGRP uses the Commission adopted framework for export compensation in the Net Billing Tariff (NBT):** The Settlement Agreement adopts export compensation for VGRP that averages the ACC values in the same way as NBT. This methodology will create consistency for customers and further uses prior Commission determinations to develop a reasonable export compensation rate for EV exports.

---

[1] *See* Comments of the Public Advocates Office to Vehicle To Grid Rate Proposal Settlement Agreement, filed on October 6, 2025.

[2] *See* Joint Reply Comments of Southern California Edison Company (U 338-E), CALSTART, Inc., Small Business Utility Advocates, Solar Energy Industries Association and Vehicle-Grid Integration Council in Support of Vehicle To Grid Rate Proposal Settlement Agreement filed on October 27, 2025.

[3] D.22-12-056, Finding of Fact 100.

- **The Settlement Agreement is consistent with Commission policy:** The Commission has worked to support vehicle-grid integration (VGI) consistent with Senate Bill 676[4] and California's broad climate and affordability goals.

Importantly, VGRP will allow California to use better use EVs as a grid resource, and, as stated by SCE, EVs "if tapped effectively, could help address the burgeoning challenges facing the grid as it integrates increasing volumes of renewable energy sources."[5] However, in order to tap into EVs and unlock their full capabilities, the Commission must set rates and programs that drive customers to provide grid services. VGIC believes that VGRP does so. Specifically, "VGRP can underpin a degree of certainty for bidirectional charging supply chain development, distribution channels, customer engagement, and overall ecosystem that has never been achieved through the few one-off pilot projects that have been authorized to date."[6] These substantial benefits should be considered by the Commission when evaluating the settlement agreement.

## III. CONCLUSION.

VGIC appreciates the opportunity to provide this reply brief. Given the record of this proceeding, the Commission should adopt the VGRP Settlement Agreement.

Respectfully submitted,
/s/ Zach Woogen
Zach Woogen
Executive Director
**VEHICLE-GRID INTEGRATION COUNCIL**

Date: November 24, 2025

---

[4] Ex. VGIC-01 at p.5. Senate Bill 676 (Bradford, 2019) requires the Commission to "establish strategies and quantifiable metrics to maximize the use of feasible and cost-effective electric vehicle grid integration."

[5] Ex. SCE-04, p. 122; Ex. SCE-04A, p. 121. Also cited in the Joint Reply Comments of the Settling Parties in Support of Vehicle To Grid Rate Proposal Settlement Agreement at p.2.

[6] Ex. VGIC-01 at p.14.