BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

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Application of Southern California Edison Company (U-338E) for Approval of Large Power Dynamic Pricing Rate.	Application 24-06-014 (Filed September 30, 2024)
And Related Matter.	Application 24-12-008

SUPPLEMENTAL OPENING BRIEF OF THE VEHICLE-GRID INTEGRATION COUNCIL

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Pursuant to Rule 13.1 of the Rules of Practice and Procedure of the California Public Utilities Commission ("Commission") and the *Administrative Law Judge's Ruling Modifying Schedule and Providing Supplemental Opening Brief Instructions* ("Ruling") issued on July 8, 2026, the Vehicle-Grid Integration Council ("VGIC") hereby submits this Supplemental Opening Brief on the consolidated *Application of Southern California Edison Company (U 338-E) for Approval of Large Power Dynamic Pricing Rate.*

I. RESPONSE TO ISSUE 5 REGARDING EXTENSION OF EXPANDED DYNAMIC RATE PILOT.

ALJ Ruling Issue 5:

In its supplemental testimony, SCE requests that the Commission expand the scope of this proceeding to consider extending the timeline and budget of SCE's Expanded Dynamic Rate Pilot, which SCE states it must rely on to maintain compliance with the California Energy Commission Load Management Standards until the Standard Dynamic Rate can be implemented, with an implementation estimate of Quarter 1 of 2030.

a. Is SCE's implementation timeline for the Standard Dynamic Rate reasonable? Please explain: i.) how the proposed timeline compares to the implementation timeline for the Expanded Pilots, ii.) what changes are needed compared to the Expanded Pilots, and iii.) how long each proposed change will take.

b. Given that SCE's Expanded Pilots are currently authorized to end by December 31, 2027, what process should be initiated to enable SCE's customers to have continued access to a dynamic rate, or dynamic rate pilot?

VGIC recommends herein a process that should be initiated to enable SCE's customers to continue accessing a dynamic rate or dynamic rate pilot. As detailed in the Ruling, SCE's Expanded Pilot is currently authorized to end by December 31, 2027. However, the Expanded Pilot itself currently imposes a *de facto* exclusion on certain interested customers, and VGIC is concerned this would continue through 2026, 2027, and, if extended, future years. Specifically, SCE's *de facto* exclusion of non-net energy metering ("Non-NEM") exporting customers, namely bidirectional electric vehicle ("EV") charging customers, represents a significant departure from the Commission's intent detailed in Decision ("D.") 24-01-032 authorizing the Expanded Pilot and the more explicit Commission language included in D.26-04-033.

As SCE notes in its *Reply to the Vehicle Grid Integration Council's Protest of Advice 5596-E,* bidirectional EV charging customers are not *explicitly* excluded from the Expanded Pilot; rather, "they simply are not entitled to pilot rate compensation for exports."[1] Practically speaking, customers making significant upfront investments in grid-parallel bidirectional EV charging systems, including paying the $800 interconnection application fee for small non-NEM systems, hold an interest in supporting the grid through exports that would yield customer credits or compensation commensurate with the value provided. As such, although SCE *technically* permits bidirectional EV charging customers to participate in its Expanded Pilot, there is no reasonable justification for a customer to do so without the Expanded Pilot promoting grid exports in addition to load optimization. In turn, SCE, the Commission, and California grid stakeholders at large are not provided any opportunity to learn about SCE bidirectional EV charging customer behavior in response to the Expanded Pilot. VGIC struggles to understand the rationale for D.24-01-032 to

[1] Conner Flanigan. *Southern California Edison Company's Reply to the Vehicle Grid Integration Council's Protest of Advice 5596-E.* August 28, 2025.

have included a dedicated discussion on BTM storage systems and EVSE if the goal was not to gain these learnings (i.e., to inform future rate and program design).[2] D.24-01-032 highlights that the staff proposal recommended allowing BTM storage systems and EVSE to participate in the expanded pilots subject to the requirements in Attachment B. The referenced Attachment B is focused primarily on the treatment of bidirectional EV charging equipment, detailing how such equipment should be treated in the Expanded Pilots. Specifically, Attachment B states:

- "Any DC V2G EVSE that has UL 1741 certification…may interconnect initially **for the purpose of participating in the expanded pilots.** (emphasis added)"
- "**Only during participation in the expanded pilots**, the customer (or the customer's authorized third party) is permitted to virtually aggregate separately metered EVSE that have a Rule 21 interconnection agreement with other load and generation… **to allow export from the EVSE to reduce the host site's load and export from such aggregation**… (emphasis added)."

In D.24-01-032, the Commission then states, "It is reasonable to allow customers with BTM storage systems, including sub-metered systems, to participate in the expanded pilots..." and "It is reasonable to allow customers with EVSE, including sub-metered systems, to participate in the pilot, subject to the rules in Attachment B."[3] **Taken together, the Commission's intent in coming to these determinations in the 2024 Decision is clear: bidirectional EV charging customers should be eligible to export to the grid through SCE's Expanded Pilots.** Neither SCE nor the Commission has since provided evidence or asserted that the Commission erred in making this determination. In fact, the opposite has occurred.

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[2] D.24-01-032 at 58.

[3] D.24-01-032 at 58.

The Commission seems to have since **reaffirmed** the value of encouraging grid-aligned bidirectional EV charging exports through dynamic rate pilots. In D.26-04-033, the Commission rejected a static, Avoided Cost Calculator ("ACC") based export rate proposed by SCE, citing that additional evaluation is needed and that, in the interim, **"…existing dynamic pricing pilots approved in D.24-01-032 should be utilized"** (emphasis added). [4] Despite the language in D.24-01-032 to "allow export from the EVSE to reduce the host site's load and export from such aggregation" and D.26-04-033 rejecting a static V2G export credit and *clearly* stating that "**existing dynamic pricing pilots approved in D.24-01-032 should be utilized**" (emphasis added) SCE has not promoted bidirectional EV charging customer exports through its Expanded Pilots, even though the Expanded Pilots have been available to customers for over a year.[5]

Today, 18 light-duty vehicle models across nine vehicle brands, in addition to nearly every electric school bus sold in the U.S., offer grid-parallel bidirectional EV charging features.[6] Customers are eager to adopt new technologies and seek opportunities to support the grid, as demonstrated by SCE's own customer survey data.[7] Similarly, the aggregators or "ASPs" that coordinate customer response have made significant investments to take advantage of the Expanded Pilot and other CalFUSE rate initiatives based on the clear signals that bidirectional EV charging exports would, in fact, be supported. These signals include the 2022 CalFUSE whitepaper (to which the *SCE Expanded Flexible Pricing Rate Pilot* webpage's Frequently Asked Questions

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[4] D.26-04-033 at 49-50.

[5] This includes: 12 vehicle models from General Motors, Ford F-150 Lightning, Nissan Leaf, Kia EV9, Volvo EX90, Polestar 3, and the Tesla Cybertruck. For many of these vehicles, the feature is offerred across multiple model years.

[6] *See* https://gmenergy.gm.com/, https://redwds.dcbel.energy/

[7] A.24-03-019. Ex. SCE-04, pp. 125-126; Ex. SCE-04A, pp. 124-125.

section directly refers customers[8]) and subsequent working group, D.24-01-032 (including, namely, Attachment B which specifically details the treatment of bidirectional EV charging equipment), PG&E's awarding of export credits through its Expanded Dynamic Rate Pilot *Hourly Flex Pricing*, and, most recently, D.26-04-033. Despite expanded product availability and investments from ASPs, the market for bidirectional EV charging solutions is still emerging, and there are very few stable price signals available to encourage customers to leverage these systems when it is most beneficial to the grid. The Expanded Pilot, if implemented to align with D.24-01-032 and D.26-04-033, would be one of the only forms of utility compensation for grid-friendly bidirectional EV charging behavior in California. The only other options available to SCE customers are the Emergency Load Reduction Program and Demand Side Grid Support ("DSGS"), both of which are currently set to sunset in 2027 or, in the case of DSGS, earlier if additional funding is not provided. VGIC stresses the importance of ensuring that bidirectional EV charging exports are incorporated into SCE's Expanded Pilot.

In response to the Ruling's issue 5, VGIC strongly recommends that the following process be initiated to enable SCE's customers to have continued access to a dynamic rate, or dynamic rate pilot, including by expanding access *before* the December 31, 2027 sunset date:

1. **The Commission should direct SCE to file a Tier 1 Advice Letter within 30 days to clarify that bidirectional EV charging exports will be recognized and credited in the Expanded Pilot, as the Commission states in D.26-04-033.**

[8] *SCE Expanded Flexible Pricing Rate Pilot* – Frequently Asked Questions. Accessed July 22, 2026. https://www.sce.com/factsheet/dynamic-pricing-rate-pilot

2. **The Commission should direct SCE to file a Tier 2 Advice Letter within 90 days to detail its extension of the Expanded Pilot until a new dynamic rate pilot is available to customers.**

In general, VGIC remains discouraged that SCE continues to overlook the Commission's repeated indications that bidirectional EV charging exports should be promoted through the use of its Expanded Pilot, whether that signal comes from the implicit inclusion of bidirectional EV charging equipment rules in D.24-01-032 or the explicit statement in D.26-04-033 that **"…existing dynamic pricing pilots approved in D.24-01-032 should be utilized"** in lieu of a static export credit. Regarding the availability of export credits to non-NEM customers in SCE's Standard Dynamic Rates ("SDR"), VGIC reserves further responses to reply briefs.

II. CONCLUSION.

VGIC appreciates the opportunity to submit this Supplemental Opening Brief and looks forward to continued collaboration with the Commission, SCE, and other parties on this important initiative.

Respectfully submitted,

/s/ Zach Woogen

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Date: July 22, 2026