BEFORE THE PUBLIC UTILITIES COMMISSION

OF THE STATE OF CALIFORNIA

FILED
07/27/26
04:59 PM
R2106017

Order Instituting Rulemaking to Modernize the Electric Grid for a High Distributed Energy Resources Future.	Rulemaking 21-06-017 (Filed June 24, 2021)

RESPONSE OF THE MOBILITY HOUSE TO ASSIGNED COMMISSIONER'S AND ADMINISTRATIVE LAW JUDGE'S RULING REQUESTING COMMENT ON ASSIGNED COMMISSIONER'S PROPOSAL ON FLEXIBLE SERVICE CONNECTIONS

Jacqueline Piero
US Head of Policy
The Mobility House
545 Harbor Blvd
Belmont, CA 94002
Tel: (650) 232-4200
Email: jacqueline.piero@mobilityhouse.com

July 27, 2026

BEFORE THE PUBLIC UTILITIES COMMISSION

OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking to Modernize the Electric Grid for a High Distributed Energy Resources Future.	Rulemaking 21-06-017 (Filed June 24, 2021)

RESPONSE OF THE MOBILITY HOUSE TO ASSIGNED COMMISSIONER'S AND ADMINISTRATIVE LAW JUDGE'S RULING REQUESTING COMMENT ON ASSIGNED COMMISSIONER'S PROPOSAL ON FLEXIBLE SERVICE CONNECTIONS

In accordance with Rule 6.2 of the Rules of Practice and Procedure of the California Public Utilities Commission ("The Commission") The Mobility House ("TMH") respectfully submits this response to the July 7, 2026 *Assigned Commissioner's And Administrative Law Judge's Ruling Requesting Comment on Assigned Commissioner's Proposal On Flexible Service Connections*, entitled "Flexible Service Connections: Advancing Affordable Electrification Through Efficient Grid Utilization" ("The Proposal"). These comments are timely filed per the extension granted by the Administrative Law Judge's *Email Ruling Granting Schedule Modification* issued July 10, 2026.

Introduction

TMH is a 16-year-old EV charging solutions company with 300+ employees serving customers in California, across the US, and in 10 countries. The company's charge management platform, "Chargepilot", and aggregation platform, "Cascade", enable reliable

and efficient charging as well as grid integration of electric vehicle fleets using intelligent charging, energy management, Automated Load Management ("ALM"), Vehicle-to-Grid ("V2G"), and stationary storage solutions. Chargepilot has been rolled out with 1500+ fleets across North America and Europe. TMH's comments will be generally focused on the proposition and experience of EV fleets engaging in FSC.

The Mobility House commends The Proposal's recognition of the need to consider and address flexible service connections ("FSC") in the broader context of utility operations and planning, as well as the potential ratepayer benefits that may accrue from their regular and deliberate use The Commission declined to address in R.24-01-018.[1] The Proposal raises multiple topics that should be addressed as FSC become more common. Several of the recommendations would benefit from deeper examination and consideration as to how they fit with current utility business models in addition to their appropriateness given current technological capabilities of both utilities and industry. We appreciate the opportunity to comment.

Section 2. The Affordability Opportunity: Reducing Customer and Ratepayer Costs Through Flexible Capacity Solutions

The Proposal asserts that both Bridging and Non-Bridging FSC can provide ratepayer benefits, stating that Bridging solutions can bring increased revenue and decreased wait times for energization, while Non-Bridging solutions can result in improved asset utilization, decreased need for new infrastructure, and improved sequencing of investments.[2] If ratepayer benefits are to be a pillar of the motivation for standard use of both Bridging and Non-Bridging solutions, The Commission should go beyond the consideration given in R.24-01-018 and fully define those values. Absent a fully fleshed out structure defining values, metrics, and goals, utilities cannot be expected to effectively use the tools being contemplated here. The same can be said of references to increasing

[1] R.24-01-018. *Decision Establishing A Standard Offer For Flexible Service Connections* (February 5, 2026). Page 18.
[2] R.21-06-017, *Assigned Commissioner's Proposal On Flexible Service Connections* (July 7, 2026). Page 14.

utilization of existing infrastructure in Section 2 and throughout the document. While TMH supports consideration of increased utilization as a goal, The Commission should explain exactly what it means by that. TMH therefore suggests that if the recommendations in this proposal are to be implemented, The Commission add the following questions to the scope of this rulemaking or an appropriate successor rulemaking:

1. Is the goal of increased utilization defined solely as utilization of individual assets, or some manner of average asset utilization across a given utility's territory?
2. How is "utilization" defined? Are new metrics necessary?
3. Is any increase a success, or is there a "sweet spot" utilities should be aiming for?
4. Is there an upper utilization limit beyond which marginal benefits decrease?
5. How are the utility's ability to effectively and safely operate its grid accounted balanced against increased utilization?
6. By what method would these benefits be quantified for rate cases?
7. Once quantified, can these benefits be used to determine compensation to customers who agree to FSC?
8. Once quantified, how can these benefits be used to determine an appropriate incentive structure to guide utilities in appropriately deploying these tools? The proposals in this document represent a transformative change in grid planning, construction, and operation whose potential benefits are not currently accessible in California utility business models and incentive structures so far as TMH is aware. Deployment of these extensive tools, with goals of increased utilization, cannot succeed without carefully designed and aligned metrics and incentives.

Section 4. Recommendations, Operating Envelopes and Dynamic Capacity Management

TMH recommends changing the language recommending Limited Power arrangements as the "default mitigation" for distribution transformer upgrades. This would amount to a form of "flexibility-first" grid planning, along the lines of what has been seen in UK. While TMH is

not opposed to this in principle, flexible connections are sufficiently new that this potential mitigation remain and option rather than a requirement.[3] As utilities and industry develop standardized processes guaranteeing a consistent and equitable customer experience, it may make sense to revisit an on-ramp to flexible connections as a default mitigation, but for now, TMH recommends including a check-box on load requests that must be checked in the affirmative to trigger Limited Power as a first mitigation.

Section 6. Recommendations, Bridging and Non-Bridging Approaches

The proposal to define a Non-Bridging Connection as lasting ten years should be further specified and the basis for the duration reconsidered.[4] The Commission should confirm if this definition means that any FSC lasting fewer than 10 years is by default considered a Bridging Connection, or if it means that a Non-Bridging Connection can last no longer than 10 years. Either way, there appears to be a gap between the average 3-year duration of a Bridging Static FSC noted in R.24-01-018 and the proposed duration of a Non-Bridging Connection in this proceeding.[5] This proceeding should assess the duration customers are willing to accept as a temporary condition as well as the potential impacts on ratemaking of defining certain durations as Bridging or Non-Bridging.

TMH disagrees that the average warranty of control equipment should be the primary basis for this duration, as control systems can be replaced and updated without interrupting operations. The duration should be based on the impact of the deferral on both customer and utility operations as well as on values that arise from different durations naturally effecting a change in status from Bridging to Non-Bridging.

Section 8. Real Time Pricing and Economic Signals for Flexible Connection Customers

[3] R.21-06-017, *Assigned Commissioner's Proposal On Flexible Service Connections* (July 7, 2026). Page 47.
[4] R.21-06-017, *Assigned Commissioner's Proposal On Flexible Service Connections* (July 7, 2026). Page 54.
[5] R.24-01-018. *Decision Establishing A Standard Offer For Flexible Service Connections* (February 5, 2026). Page 10.

Regarding the proposal to default all FSC customers to RTP rates[6], the Commission should consider how linking FSC to default RTP, even with an opt out option, may dissuade customers whose flexibility is limited from participating in FSC at all. TMH understands that the RTP proposal is meant to save customers money while optimizing use of existing resources. While EVs are generally considered to be highly flexible loads, there is a limit to that flexibility defined by the minimum total kWh of energy required every 24 hours to successfully operate a fleet. If the charging restrictions in the FSC limit the ability of the customer to further shift charging to low-cost times defined by the RTP the day before, the customer would lose the benefits of the RTP rate. Synergies may exist, but customers should be allowed to opt *in* to RTP if they have or can feasibly procure the necessary technology and determine through modelling or simulations that RTP will be possible to comply with.

The proposal to default all flexible connections customers to RTP rates with an opt out option[7] also seems in opposition to the previous prioritization of flexible technical requirements to maximize customer participation in FSC by allowing customers to control load in the manner in which they are able.[8] While allowing customers to choose their method of controlling load for FSC lowers the technical bar and allows customers to choose a solution that matches their ability for technical sophistication and acceptance of potential associated cost and complexity, real time rates such as PG&E's Hourly Flex Pricing ("HFP") pilot, for example, seem to necessitate procurement of systems capable of ingesting, optimizing for, and acting upon hourly day ahead pricing. Linking RTP with FSC, even with an opt out, creates friction for customers making the decision to accept an FSC or not. Rather than an opt out, if The Commission chooses to go ahead with default RTP for FSC customers, TMH recommends the following:

[6] R.21-06-017, *Assigned Commissioner's Proposal On Flexible Service Connections* (July 7, 2026). Page 42.
[7] Ibid.
[8] R.21-06-017, *Assigned Commissioner's Proposal On Flexible Service Connections* (July 7, 2026). Page 39.

1. Expand access to Real Time Pricing rates to all customers. TMH has several customers interested in RTP whose current rates disqualify them from switching.[9] Before making the rates default, expand access to anyone who may want to choose them.
2. Request that the IOUs create additional elements of their FSC options and promotional materials introducing customers to the potentially synergistic effects of choosing an RTP rate.
3. Consider adding representative modelling of FSC and RTP to fleet advisory services to help customers visualize successful dual participation.

Conclusion

This Proposal raises multiple important topics that warrant further investigation and discussion. TMH looks forward to contributing to this process going forward.

Respectfully Submitted,

/s/ Jacqueline Piero

Jacqueline Piero
US Head of Policy
The Mobility House
545 Harbor Blvd
Belmont, CA 94002
Tel: (650) 232-4200
Email: jacqueline.piero@mobilityhouse.com

July 27, 2026

[9] The primary example TMH can provide is the currently limited access for EV fleets to PG&E's HFP rate having gone through makeready program to facilitate electrification in the first place. As Real Time Pricing rate mature, The Commission can facilitate increased participation by creating coherent interlocking structures rather than balkanized, potentially competing programs.