

DOCKETED

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*Comment Received From: Anna Bella Korbatov
Submitted On: 3/16/2026
Docket Number: 22-RENEW-01*

Fermata Energy Comments on the Demand Side Grid Support Program Draft Guidelines, Fifth Edition

Dear CEC Staff:

Fermata Energy appreciates the opportunity to provide comments, attached here, on the Demand Side Grid Support (DSGS) Program Draft Guidelines, Fifth Edition published by the California Energy Commission (CEC).

Thanks,
Anna Bella Korbatov
VP, Regulatory Affairs
Fermata Energy

Additional submitted attachment is included below.

Via Electronic Submission

Email to: docket@energy.ca.gov

Docket Number: 22-RENEW-01

Subject: California Energy Commission Demand Side Grid Support Program Guidelines

March 16, 2026

RE: Comments of Fermata Energy on the Demand Side Grid Support Program Draft Guidelines, Fifth Edition

Dear CEC Staff:

Fermata Energy appreciates the opportunity to provide additional comments on the Demand Side Grid Support (DSGS) Program Draft Guidelines, Fifth Edition published by the California Energy Commission (CEC).

About Fermata Energy and Nuvve Holding Corp.

Fermata Energy, a subsidiary of Nuvve Holding Corp., is a leading provider of Vehicle-to-Everything (V2X) bidirectional charging services. Founded in 2010 and acquired by Nuvve in 2025, Fermata Energy has spent over a decade unlocking the value of electric vehicle (EV) batteries. Our proprietary V2X platform, which integrates bidirectional hardware with our advanced optimization software, enables EVs to serve as dispatchable energy storage resources. Today, Fermata's customers earn thousands of dollars per vehicle through proven Vehicle-to-Grid (V2G) and Vehicle-to-Building (V2B) programs nationwide.

Fermata's parent company, Nuvve Holding Corp. (Nasdaq: NVVE), is a San Diego-based global leader in V2G technology and battery energy storage solutions. Together, the companies provide a comprehensive suite of distributed energy resource (DER) solutions, including V2G, V2B, V2H, and utility-scale stationary Battery Energy Storage Systems (BESS). By aggregating mobile and stationary battery capacity, Nuvve and Fermata optimize charging, lower the total cost of ownership for fleets, and accelerate the transition to a resilient, renewable-powered grid.

Fermata Energy concurs with VGIC and recommends that the CEC consider the following changes to the proposed Fifth Edition Draft Guidelines:

EVSE With Permission to Operate After December 31, 2025 Should Be Allowed to Enroll in DSGS in 2026

Currently, the Draft Guidelines require that EVSE enrolling under Option 3 must secure Rule 21 Permission to Operate (PTO) by December 31, 2025. This restrictive deadline does not align with the current state of the market, as bidirectional EV technology is still in its early deployment phase. Many critical V2G projects currently in the development pipeline are not slated to receive PTO until 2026.

In fact, Fermata Energy and Nuvve have several V2G electric school bus (ESB) projects awaiting PTO that would elect to participate in DSGS Option 3 instead of the Emergency Load Reduction Program (ELRP) if given the opportunity to do so for the 2026 summer season. Removing sites that obtained PTO in early 2026 or those that are soon to achieve PTO from DSGS eligibility hurts the V2G business case and disincentivizes customers from engaging in V2G operations in future years.

Additional EVSE DSGS Providers Should Be Allowed to Enroll in DSGS Option 3 in 2026

The Revised Draft Guidelines currently restrict 2026 Option 3 participation to providers who were enrolled in 2025. While intended to simplify administration, this restriction stifles the rapidly evolving bidirectional EV market.

Limiting the program to legacy providers creates several risks:

- It excludes new vehicles, chargers, and aggregation platforms that have only recently reached market readiness.
- It relies on a narrow group of aggregators rather than building a diverse, statewide ecosystem of VGI service providers.

To accommodate new providers without straining the CEC's limited budget for DSGS, the CEC should consider reserving a portion of Option 3 funding specifically for new EVSE entrants in the first round of 2026 allocations. Alternatively, the CEC could leverage additional funding from the Distributed Electricity Backup Assets (DEBA) program to support participation from new aggregators.

Conclusion

We commend the California Energy Commission (CEC) for its continued administration of the DSGS program and for proposing updated guidelines to ensure the program can evolve and remain an affordable, scalable grid reliability solution despite recent funding challenges. DSGS has demonstrated its ability to deliver flexible, reliable, and clean demand-side resources during periods of grid stress. The program already includes nearly 1.145 GW of enrolled capacity,¹ roughly the size of a nuclear power plant.

Importantly, DSGS is the only statewide program through which investor-owned utilities, municipal utilities, and electric cooperatives can offer participation opportunities to VGI/V2G customers. For VGI service providers and our fleet customers, DSGS plays a key role in supporting the business case for bidirectional charging and remains a critical component of the overall VGI value stack. While other V2G export compensation programs exist and additional programs are expected to become available to light-duty and medium- and heavy-duty customers, DSGS remains uniquely attractive to fleet operators due to its competitive compensation levels and the frequency with which events are called compared to programs such as ELRP.

For these reasons, it is critical that DSGS remain open to new VGI aggregators for the 2026 program year and to VGI customers that achieve Permission to Operate (PTO) in early 2026. Imposing restrictions on new participation risks discouraging long-term customer engagement in V2G operations by introducing uncertainty for both customers and project developers.

Fermata Energy and Nuvve appreciate the opportunity to share these comments with the CEC and look forward to collaborating with the CEC and other stakeholders in this docket.

Sincerely,
/s/ Anna Bella Korbatov
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Fermata Energy
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¹ CEC Staff Analysis of the DSGS Program 2024 Performance Data (Oct 2025), available at: <https://efiling.energy.ca.gov/GetDocument.aspx?tn=266629>