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THE OFFICE OF RATEPAYER ADVOCATES' COMMENTS ON THE CALIFORNIA ENERGY COMMISSION'S PUBLIC WORKSHOP ON VEHICLE-GRID INTEGRATION COMMUNICATION STANDARDS

December 22, 2016

The Office of Ratepayer Advocates (ORA) is the independent consumer advocate within the California Public Utilities Commission (CPUC), with a mandate to obtain the lowest possible rates for utility services consistent with reliable and safe service levels, and the state's environmental goals.

ORA appreciates the opportunity to provide comments and recommendations on the California's Energy Commission's (CEC) December 7, 2016 workshop on Vehicle-Grid Integration (VGI) Communication Standards.[1] This workshop was held to discuss the adoption of VGI communication standards in support of the State's implementation of the transportation electrification directives of Senate Bill 350.

ORA supports standardizing VGI communication protocols to the extent that they foster transportation electrification, facilitate inter-operability, and promote cybersecurity. The adoption of standards can avoid stranded assets should competing protocols become obsolete. Standardizing facilitates inter-operability and fosters electrification by providing consistent metering, telemetry, and billing across a wide range of vehicles, charging stations, and service territories. Standardizing also promotes cybersecurity. For example, San Diego Gas & Electric Company's (SDG&E) project revealed that in order to aggregate and enable dispersed electric vehicle (EV) and energy storage resources to participate in the wholesale market, multiple integration points are needed.[2] This increased the number of potential failure points and the vulnerability for cyber-attacks. Standardizing will remove potential failure points by minimizing the need to decrypt and encrypt information along the communication stream. To that end, ORA recommends convening a VGI communication working group, similar to the Rule 21 Smart Inverter Working Group, to determine technical requirements including communication standards for EVs.

[1] CEC's Docket Number 16-TRAN-01, SB 350 Transportation Electrification

[2] SDG&E's OPRA (Optimized Pricing and Resource Allocation) Project Multi-Use Application – Use Case #3