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**COMMENTS OF NUVVE CORPORATION ON THE DRAFT 2020
INTEGRATED POLICY REPORT UPDATE**

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Nuvve is an Electric Vehicle Service Provider (EVSP) working to commercialize VGI and V2G technologies in California, and has participated extensively in interconnection, demand response, and Transportation Electrification proceedings at the Commission and Public Utilities Commission. As a leader in the V2G space, Nuvve has broken barriers in communications, hardware, aggregation, market access, interconnection, and standards development to move bi-directional EV technology toward commercialization. Having partnered with EVSE and automotive manufacturers, we are now confident that we are ready, from both technological and regulatory perspectives, to roll out DC V2G school buses commercially in California. We are now approaching customers with a commercial offer, and building a pipeline of potential clients. Having begun this process we are now discovering unintentional structural disincentives to V2G in the transportation electrification programs on which schools depend of assistance and funding as they move to electrify their bus fleets. The most obvious disincentive is the typical program requirement that EV installations be separately-metered, which we lay out in detail in our separately-submitted joint comment with Enel X. The second and more surprising disincentive is that some programs cannot include V2G installations at all.

Southern California Edison (SCE) is a recognized leader in V2G, having played a pivotal role in the R. 17-07-007 working groups that ultimately resulted in confirmation that DC V2G may be interconnected in California. They have continued to work with stakeholders to understand the barriers to AC V2G, pushing to give UL and SAE the input they need to revise and combine their standards to make it possible to interconnect and use EVs with onboard inverters. This work is being watched by stakeholders around the world, and we continue to work with and learn from SCE's experts.

Despite all of this, SCE recently notified Nuvve that SCE's Charge Ready Transport program design can only accommodate uni-directional chargers and our Rule 21-compliant bi-directional chargers do not qualify. We therefore cannot list a bi-directional charger on their Approved Product List, and cannot install bi-directional chargers in bi-directional mode

using program funds, and cannot make a V2G offer to customers who wish to take advantage of the program to electrify their fleets.

The SB 350 programs have been a success at pushing transportation electrification in California. We wish to point out, however, that the cross-disciplinary nature of V2G technology implicates a range of programs, rules, and departments in both utilities and regulatory agencies. Vehicle electrification cannot be the sole focus of some programs, while others focus on VGI. This fragmentation has produced an environment in which a commercially available and standards-compliant V2G system cannot be rolled out. We urge the CEC and the CPUC to re-evaluate their plans for VGI and V2G initiatives if and as they involve transportation electrification programs that are not fit for these purposes. We further urge that AB 841 implementation seek to address these unintentional, but strong disincentives to V2G and VGI in California. We recommend a new, coherent and holistic perspective that recognizes and mitigates the structural barriers to VGI and V2G. Without this change, companies like our will have little opportunity to introduce this technology in California.