

**DOCKETED**

<b>Docket Number:</b>	22-RENEW-01
<b>Project Title:</b>	Demand Side Grid Support Program
<b>TN #:</b>	244257
<b>Document Title:</b>	Nuwe Hold Corp Comments
<b>Description:</b>	N/A
<b>Filer:</b>	System
<b>Organization:</b>	Nuwe
<b>Submitter Role:</b>	Public
<b>Submission Date:</b>	7/29/2022 3:04:11 PM
<b>Docketed Date:</b>	7/29/2022

*Comment Received From: Jacqueline Piero*  
*Submitted On: 7/29/2022*  
*Docket Number: 22-RENEW-01*

**Nuvve Hold Corp Comments on 22-RENEW-01**

*Additional submitted attachment is included below.*



**Comments of Nuvve Holding Corp  
Demand Side Grid Support Program proposed draft guidelines  
CEC Docket #22-RENEW-01**

Nuvve is a San Diego-based company operating across the U.S. and internationally whose mission is to lower the cost of electric vehicle (“EV”) ownership while supporting the integration of renewable energy sources, such as wind and solar. Nuvve’s Grid Integrated Vehicle platform (“GIVE”), transforms EVs into vehicle-to-grid (V2G) assets when those vehicles are connected to a bidirectional charger while guaranteeing the expected level of charge at the time the owner or driver needs it for transportation. We appreciate the opportunity to comment.

Nuvve supports the Demand Side Grid Support (DSGS) program initiative to expand system-wide enhanced demand flexibility opportunities along the lines of the Emergency Load Reduction Program (ELRP) to Publicly Owned Utilities and others outside the CPUC structure. Nuvve is in the process of entering bidirectional Electric Vehicle Service Equipment (EVSE) into the ELRP and hopes to do the same with any new structure that emerges from this process. Nuvve therefore offers the following recommendations:

- Confirm that bidirectional EVSE systems will be included in this program
- Confirm that bidirectional EVSE systems will be included in the loading order as energy storage along with other zero-emissions resources that may be compensated for export
- Confirm that resources bidding via structures such as the Proxy Demand Response for DSGS can be compensated for energy exports. Even if these structures are not formally processing bids for this program, the PDR mechanism is not designed to count or to compensate for exports. ELRP was partly a mechanism to address this structural disincentive’ Nuvve hopes CEC pursue a similar result.
- Confirm that bidirectional EVSE systems can be compensated for export. Many make-ready assistance programs place new EV infrastructure on a separate electrical service with a dedicated meter and account, leaving the EV with no load against which to baseline. Compensating for export allows V2G systems to tap their full grid support capability when isolated in parking lots with no other loads or resources.

Respectfully Submitted,

/s/ Jacqueline Piero

VP of Policy

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Date: 29 July 2022