

DOCKETED

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**SDG&E Comments, Workshop on Electric School Bus Bi-
Directional Infrastructure Funding Concept**

Additional submitted attachment is included below.



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September 30, 2022

California Energy Commission
Docket unit, MS-4
Re: Docket No. 19-TRAN-02
715 P Street
Sacramento, CA 95814

RE: SDG&E's Response to the CEC's Workshop on Electric School Bus Bi-Directional Infrastructure Funding Concept (Docket # 19-TRAN-02)

San Diego Gas & Electric Company (SDG&E) appreciates the opportunity to provide comments on the California Energy Commission's (CEC) Workshop on Electric School Bus Bi-Directional Infrastructure Funding Concept, held on September 13, 2022. The workshop offered important information regarding previous, current, and projected electric school bus funding programs and provided valuable insights into the CEC's Electric School Bus and Bi-directional Infrastructure project concept. SDG&E is pleased to offer comments to inform the CEC's development of a successful program augmenting renewable energy and grid resilience through the deployment of vehicle-to-grid (V2G) technologies.

SDG&E has experience successfully implementing electric school bus and bi-directional charging infrastructure projects. SDG&E recently partnered with Cajon Valley Union School District and Nuvve to successfully deploy the first full V2G project in the nation. This project serves to support the district's transition to zero-emission vehicle technologies and adds resilience to the grid through six electric school buses with the application of V2G technology. The district may also take part in SDG&E's Emergency Load Reduction Program (ELRP), which compensates business customers \$2/kilowatt-hour (kWh) for energy exports or energy reduction to support the grid during critical events. SDG&E also filed a Commercial Electric Vehicle Dynamic Rate application with the California Public Utilities Commission. This rate – if approved – would allow V2G-capable commercial customers to export power to the grid for fair compensation.

SDG&E respectfully offers the following recommendations to help strengthen the CEC's funding concept as discussed on September 13, 2022:

The CEC should not preclude projects outside of the Tier 2 or Tier 3 High Fire Threat Districts. SDG&E recognizes and appreciates the need to add resilience to projects in High Fire Threat Districts. However, the CEC should consider where the grid would most benefit from distributed energy resources.

The number of eligible participants under the proposed concept is limited, and the high fire threat district location requirements would further limit the ability for otherwise-qualified participants to apply for funding. Eliminating this requirement will help ensure that project-ready applicants with adequate experience and capacity will be able to participate.

The 10-bus ownership requirement should be reduced or eliminated. Many V2G-capable school districts do not own or operate a fleet composed of ten or more electric school buses. This is evidenced by SDG&E's experience with the aforementioned Cajon Valley school bus V2G pilot. And given the limited awards and the vehicle acquisition exclusions under the proposed concept, the ownership requirement should be reduced to allow for more flexibility and expand inclusivity across the applicant pool. Meaningful grid support is achievable with fewer than ten vehicles, and many districts in the proposed focus areas are not yet in a position to obtain or operate that number of vehicles.

SDG&E appreciates the important role that both state and federal governments play in advancing clean transportation, V2G technologies, and grid resilience. Innovative investments in zero-emission vehicles and their interactions with the grid will be increasingly valuable in a highly electrified future and California's transition to a decarbonized economy.

Thank you for your consideration of SDG&E's comments. Please do not hesitate to contact me should you have any questions or wish to discuss our comments in greater detail. We look forward to continuing to work with Commission staff on this effort.

Sincerely,

/s/ Kirstie Raagas

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