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Ev Dot Energy Corp - Comments on DSGS Fourth Edition Guidelines

Additional submitted attachment is included below.

October 30, 2024

California Energy Commission
Docket Number: 22-RENEW-01
715 P Street
Sacramento, CA 95814

RE: Comments on EV.ENERGY CORP on the Proposed Demand Side Grid Support Program Guidelines, Fourth Edition

I. Introduction

EV.ENERGY CORP (ev.energy) appreciates the opportunity to provide input on the proposed Fourth Edition of the Demand Side Grid Support (DSGS) Program Guidelines, and the October 18th, 2024, workshop held by the California Energy Commission (CEC), which detailed the proposed updates to the DSGS program.

ev.energy commends the CEC's work to broaden the DSGS program and expand participation through increased eligibility and optionality. The CEC has already expanded the DSGS program to open participation to aggregators of EV charging management, specifically through the "Market Aware Storage Virtual Power Plant (VPP)" option, which allows for participation from aggregators of behind-the-meter battery storage, including bidirectional (V2X) electric vehicles (EVs). However, the participation options for residential, unidirectional managed charging (V1G) in the DSGS program are currently limited. Expanding participation options for the DSGS program to allow for participation from V1G assets would support California's load flexibility, greenhouse gas (GHG) emissions, and renewable energy procurement goals. Accordingly, the CEC should consider adding V1G assets to the proposed Option 4 "Emergency Load Flex VPP".

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II. Comments on the Proposed DSGS Guidelines

During the October 18th workshop, the CEC stated that the proposed Option 4 incentive option was intended to expand participation options for clean energy resources. As proposed, the option would only allow for participation through smart thermostats and electric water heaters. During the workshop CEC staff stated that the proposed Option 4 assets "were selected as appliances with high load and significant untapped load flexibility potential". Residential EV charging shares these same characteristics with smart thermostats and electric water heaters. In fact, residential EV charging load has unique characteristics that provide a greater potential for load flexibility. Specifically, most personal vehicles are stationary for 22 or more hours daily,[1] and over 80% of EV charging occurs at home.[2] This significant downtime means there is substantial flexibility for when EV charging activity can occur over the course of the day to meet drivers' needs, presenting a massive potential to manage residential EV charging around grid conditions. In contrast, customers may be less willing to shift their heating/cooling and water heater usage due to a more consistent need for those assets to be utilized. Additionally, residential EV charging load is typically around 7 kW - much larger than other home appliances - and can often be higher, allowing for a greater load shift on an individual device basis.

The inclusion of V1G managed charging assets in the DSGS program Option 4 would strengthen the CEC and California's ability to maximize the flexibility of residential distributed energy resources in the Emergency Load Flex VPP option. Crucially, it would also support the CEC's goal to make 7,000 megawatts of electricity available through the smarter use of existing clean energy resources by 2030,[3] California's GHG reduction goals,[4] and California's goal to

[1] See SEPA, The State of Managed Charging in 2021 (November 2021), p. 7. Available at: https://sepapower.org/resource/managed-charging-incentive-design/.
[2] See David Hurlbut, et al, Electric Vehicle Charging Implications for Utility Ratemaking in Colorado, NREL, slide 10, available at: https://www.nrel.gov/docs/fy19osti/73303.pdf.
[3] https://www.energy.ca.gov/publications/2023/senate-bill-846-load-shift-goal-report?utm_medium=email&utm_source=govdelivery.
[4] https://ww2.arb.ca.gov/sites/default/files/2023-04/2022-sp.pdf.

reach 100% clean electricity by 2045.[5] Accordingly, we recommend that the CEC consider modifying proposed Option 4 to include V1G-capable EV charging as an eligible resource for the DSGS program.

III. Conclusion

ev.energy appreciates the opportunity to provide these comments on the proposed Fourth Edition of the DSGS Program Guidelines. We look forward to further collaboration with the CEC and other stakeholders on the future of the DSGS program.

Respectfully submitted,

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[5] https://www.energy.ca.gov/publications/2021/2021-sb-100-joint-agency-report-achieving-100-percent-clean-electricity.