

DOCKETED

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Comments of VGIC in Support of DSGS Option 4

Additional submitted attachment is included below.

March 21, 2025

Email to: docket@energy.ca.gov

Docket Number: 22-RENEW-01

Subject: California Energy Commission Demand Side Grid Support Program Guidelines

RE: Comments of the Vehicle Grid Integration Council on the Demand Side Grid Support Program Draft Guidelines, Fourth Edition and Option 4

Dear Sir or Madam:

The Vehicle-Grid Integration Council (VGIC) appreciates the opportunity to provide additional comments on the Demand Side Grid Support (DSGS) Program Draft Guidelines, Fourth Edition published by the California Energy Commission (CEC) and comments regarding the inclusion of Option 4 in the program and potential overlaps with Pacific Gas and Electric's (PG&E) Automated Response Technology (ART) program.

Regarding DSGS Option 4: Emergency Load Flexibility Virtual Power Plant and PG&E's ART Program.

VGIC is supportive of the proposed DSGS Option 4, Emergency Load Flexibility Virtual Power Plant Pilot, as an option for EVSE to provide emergency reliability to the state. With nearly 2 million EVs already sold in California and millions more expected, EVs represent an increasing share of the state's electric load. Given the diversity of mobility needs and charging behaviors, it is critical that EV customers have access to a wide range of demand response (DR) programs that align with their specific needs and internal cost-benefit calculations. Offering a variety of options maximizes EV contributions to grid reliability by allowing customers to select programs that best fit their operational preferences. Moreover, it promotes participation from customers who may not respond to other load management measures, like whole-premise time-of-use rates that apply to EV and non-EV load.

The DSGS program plays an important role in California's demand response portfolio as the only statewide emergency DR program available today. Unlike other DR initiatives (i.e., ART or the Emergency Load Reduction Program), DSGS allows participation from all load-serving entities, including publicly owned utilities, creating a uniform statewide option for DR aggregators and customers. Importantly, DSGS, particularly Option 4, is designed as an emergency DR program, with events triggered by Energy Emergency Alerts (EEA) and limited to a maximum of 60 hours per summer season. This structure ensures the program is focused on critical reliability events rather than routine load management.

PG&E's ART program is a fundamentally different DR offering, as it integrates resources into the CAISO wholesale market. ART operates year-round, allows for more frequent dispatch, and offers a higher annual capacity incentive due to its expanded availability. This makes ART a valuable tool for customers seeking to provide more consistent grid services. However, because ART is administered solely by PG&E, it is not available to customers outside of PG&E's service territory.

While both programs leverage smart technologies, including EVSE, to provide grid services, VGIC does not view DSGS and ART as competing. Instead, different customers and aggregators will naturally gravitate toward either program based on their operational needs and preferences. Notably, the 2019-2020 Joint CPUC-CEC Vehicle-Grid Integration Working Group detailed over 1,000 VGI use cases. This demonstrates a rich diversity in the manners in which customers interact with the grid through EVs and EVSE. Additionally, customers outside of PG&E may be weighing a completely different, and potentially more limited, menu of DR options. A diverse and flexible DR ecosystem is essential to ensuring that all capable resources, including EVs, are able to contribute to grid reliability. Lastly, while PG&E ART, if successful, may serve as a model for other load-serving entities to follow, it is unlikely that will occur in the next few years. For example, if other investor-owned utilities were to propose a program based on ART, this would need to be done via the 2028-2032 DR application cycle, which may be filed in 2027. Based on the cadence of the previous two DR application cycles, these programs would not be approved by the CPUC until 2028 and implemented until 2029.

With these factors in mind, VGIC therefore urges the CEC to adopt the DSGS guidelines, including Option 4, at the next CEC Business Meeting to ensure that EVSE and other resources can support California's reliability needs as soon as possible.

Conclusion.

VGIC appreciates the opportunity to provide these comments and looks forward to collaborating with the CEC and other stakeholders in this docket.

Respectfully submitted,
/s/ Zach Woogen
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