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Joint Utility Automaker Comments Re Draft Oct. 2017 IEPR

Additional submitted attachment is included below.

November 13, 2017

California Energy Commission
Docket Office, MS-4
Docket No. 17-IEPR-01
1516 Ninth Street
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Re: Joint Utility-Automaker Comments on the Draft 2017 Integrated Energy Policy Report

The California Electric Transportation Coalition (CaETC) submits this Joint Comment Letter on behalf of itself, American Honda Inc., BMW of North America LLC, Fiat Chrysler Automobiles, Ford Motor Company, Kitu Systems Inc., Pacific Gas & Electric, Sacramento Municipal Utility District, San Diego Gas & Electric, Southern California Edison, and the Southern California Public Power Authority (the “Joint Utility-Automaker Parties”). The Joint Utility-Automaker Parties appreciate the opportunity to provide feedback on the California Energy Commission’s (CEC’s) Draft 2017 Integrated Energy Policy Report (Draft IEPR).

We agree with the Draft IEPR’s assessment that plug-in electric vehicles (PEVs) have a lot of promise to address grid needs, that much work remains to be done, and that the “potential for use [of PEVs] in grid management is still at least several years out.” (Draft IEPR, p. 120.) Thus, we respectfully submit the following comments for your consideration:

Vehicle-Grid Integration Roadmap

CaETC supports staff’s recommendation on page 141 to update the VGI Roadmap. The following recommendations relate to how the VGI Roadmap should be updated, and what deliverables should be included in the update.

We believe that a major barrier to advancing VGI is not having a clear understanding of the value; the six months of work by the state-agency-led VGI Communications Protocol Working Group (VGIWG) has shown that addressing this barrier—by determining the value of VGI—is a major step to unlocking the vision of VGI (listed as priorities for updating the VGI Roadmap, on page 132 of the Draft IEPR). This point was mentioned in the VGI Roadmap workshop on June 13th, and repeated in a June 27th letter by CaETC, four automakers, and three utilities.¹ Therefore, we agree with the Draft IEPR, on page 131, that the economic value of VGI needs to be better understood. We urge the CEC to recognize that this value barrier must be addressed and funded

¹ Joint Utility-Automaker Comments on the California Energy Commission Docket No. 17-IEPR-12: Joint Agency Staff Workshop on the Review of the Actions and Status of State-level Energy Roadmaps, submitted June 27, 2017.

in 2018 by the state-agencies sponsoring the VGIWG, and the progress to address this barrier should be tracked as part of an updated VGI roadmap.²

As we and many other stakeholders have urged in the VGIWG,³ there are two key steps to be addressed for VGI, which can likely be done simultaneously:

1. A VGI value study that looks at promising services and benefit streams in the consolidated VGI benefits framework from Deliverable 1.1 of the Working Group; and
2. We would be supportive of the CPUC, CEC, and/or other agency authorizing funding for large scale demonstrations by utilities and others (up to 2000 EVs) of promising use cases in several different charging market segments (including public, fleet, workplace and homes) in order to get validation of the realizable benefits of VGI as well as costs of implementing VGI in real world situations. Timely and coordinated approval of cost recovery or funding would facilitate near-term validation of this VGI value.

We request the IEPR include a new recommendation for the CEC to repurpose and prioritize funding that has already been collected (or that is intended to be collected for purposes of advancing VGI) to support a partnership between automakers, utilities, charging-station providers, and others to (1) assess the VGI value proposition, and (2) pursue large-scale, multi-year demonstration projects to validate the real-world value and cost of VGI. The stakeholder partnership, or working group, established to update the VGI Roadmap should include interested parties, as well as the CEC, CPUC, and Cal ISO, additional agencies such as CARB, U.S. DOE, GO-Biz, and those agencies should have specific funding to pursue their action items. Additionally, we recommend CEC funding for expert participation in the 2018 VGIWG. This is needed based on our experience with the 2017 effort, and to be consistent with the CEC's prior funding of the consultants who created the 2014 VGI Roadmap.

The VGI issue is complex and goes beyond charging equipment. The automakers must be convinced that there is a business case to equip their EVs with VGI communications protocols, and they must think about the potential impact on their customers. They must determine if they want the EV to communicate to the charging station, directly to the grid, or to both. The utilities, charging station providers, aggregators, and other parties also need to understand the VGI value proposition, as discussed above. Our recommendations mirror the process and steps that storage and other emerging grid technologies that have gone through, but these steps require funding and a plan with broad stakeholder buy-in.

² The VGIWG has made progress in developing over 75 VGI use cases, understanding the functional, non-functional and customer requirements for VGI communications between the grid and the vehicle for these use cases, mapping these requirements to existing communication protocols, developing a glossary, and other tasks.

³ See Joint Utility-Automaker Letter to the VGI Communications Protocol Working Group Sponsoring Agencies, Re the CPUC and CARB staff proposal to futureproof the EVSE and refocus the workplan of the VGI Working Group, submitted November 8, 2017.

We also recommend that the Draft IEPR better reflect how complex VGI is, and how challenging the VGIWG effort has been. For example, the VGIWG's deliverables were supposed to be completed by October 2017, but the main deliverables on costs, benefits, and policy recommendations have not yet been launched. In addition, the Draft IEPR should not get ahead of the VGIWG by mentioning, for example, that there is agreement to use open standards or any type of communications protocols. (p. 141.) However, the five state agencies and the private-sector stakeholders in the VGIWG have proved there is great stakeholder interest in accelerating VGI efforts and have made progress on important fundamentals.⁴ A sustainable way to capitalize on that interest in 2018 is needed.

Data Collection

We support staff's recommendation on page 81 for the CEC to lead a collaborative effort with researchers; local government, air district, and utility charging infrastructure program administrators; and others to share data about charging-infrastructure programs. We agree that this collaboration will help enhance existing programs. Given that charging-station and PEV data is being collected in multiple forums, we greatly support this recommendation so that experts will be brought together to compare and understand existing data, and determine what gaps need to be addressed. As we mentioned in previous letters on the Title 20 data-collection pre-rulemaking,⁵ we support a voluntary effort as the best way to address the data needs of the state agencies, utilities, and other stakeholders. If the voluntary, collaborative effort finds critical gaps, then, in the context of the Title 20 rulemaking on transportation-electrification data collection, the stakeholder group could determine what information is needed to close the gaps. We recommend that the date to begin Phase 2 of the Title 20 data-collection rulemaking be updated to account for this voluntary effort and working-group process.

The Joint Utility-Automaker Parties appreciate the Joint Agencies' consideration of these comments and looks forward to its continuing collaboration with the Energy Commission and stakeholders.

Sincerely,

Hannah Goldsmith, California Electric Transportation Coalition
Ryan Harty, American Honda Inc.
Adam Langton, BMW of North America LLC
Rich Scholer, Fiat Chrysler Automobiles
Dave McCreadie, Ford Motor Company

⁴ See Footnote 3.

⁵ CalETC Letter Re: General Rulemaking Proceeding for Developing Regulations, Guidelines and Policies for Implementing SB 350 and AB 802: Title 20 Data Collection Regulations to Support New Analytical Needs, October 17, 2016, 16-OIR-01; CalETC Letter Re: Title 20 Data Collection Regulations, Proposed Language Discussed at the November 16, 2016 Commissioner Workshop, December 12, 2016, 16-OIR-03.

California Energy Commission
Docket No. **17-IEPR-01**
November 13, 2017
Re: Draft 2017 Integrated Energy Policy Report
Page 4

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