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**Comments on Joint CPUC-CEC VGI & Charging Infrastructure
Workshops on June 22-24**

Additional submitted attachment is included below.



Licha Lopez
CEC Liaison
State Agency Relations

77 Beale Street, B29K
San Francisco, CA 94105
(202)903 4533
E3le@pge.com

July 15, 2020

Mr. Noel Crisostomo
Fuels and Transportation Division - Existing Buildings Office
California Energy Commission
1516 9th St
Sacramento, CA 95814

RE: Pacific Gas and Electric Comments on the Vehicle Grid Integration (VGI) and charging infrastructure funding for VGI discussed during the IEPR Workshop on June 22

Dear Mr. Crisostomo:

Pacific Gas and Electric Company (PG&E) appreciates the opportunity to participate in the Vehicle-Grid Integration (VGI) discussion, and to provide feedback in response to the California Energy Commission's VGI Roadmap presented on June 22 at the Integrated Energy Policy Report (IEPR) Workshop.

PG&E supports the transportation electrification effort led by the Commission, and the integration of vehicle to the grid, and believes that affordability, cost transparency, pilot programs to understand the value of VGI use cases, the encouragement of innovation, and agency alignment are key pillars to continue the advancement of transportation electrification.

We believe that there should be a priority to align efforts across publicly funded electrification programs and vehicle-grid integration (VGI) in order to scale upgrades appropriately.

PG&E also supports the work of the agencies and stakeholders toward accessible and affordable charging infrastructure focusing on the value proposition of VGI. Charging costs need to be affordable, especially for disadvantaged communities and low-and moderate-income individuals. Open codes and standards can be a path to achieving that goal.

Clean mobility should be recognized and treated as a resource that has the potential to contribute to California's carbon-reduction goals as much as clean energy coming from other distributed energy resources (DERs) (e.g. photovoltaic systems, fuel cells, etc.). VGI adds to that value by reducing electricity supply cost, often avoiding distribution grid upgrades, and

providing resiliency services. Agencies should coordinate to unlock and leverage that value in the safest and most affordable manner.

Cost transparency on charging infrastructure and VGI is needed. After months working on VGI use cases, the Joint Agencies' VGI working group was not able to conduct a cost-benefit analysis of VGI use cases due to the lack of data. More funding is needed for pilots that contribute to a better understanding the costs, the benefits and the net value of VGI use cases.

Agencies need to help develop and encourage innovation and enable customer choice with a technology-neutral approach to VGI and not over prescribe in regulations and grant requirements.

It would be important that state agencies engage experts on charging infrastructure and VGI to create safe, clean, reliable and affordable solutions to meet California's transportation electrification and climate goals.

PG&E continues to support transportation-sector electrification to help meet California's decarbonization goals. Please feel free to contact me if you have any questions or concerns.

Sincerely,

Licha Lopez