

DOCKETED

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January 20, 2021

California Energy Commission
Re: Docket No. 20-EPIC-01
1516 Ninth Street
Sacramento, California 95814-5512

Submitted to on-line portal: <https://efiling.energy.ca.gov/Ecomment/Ecomment.aspx?docketnumber=20-EPIC-01>

Re: Comments on the CEC Staff Workshop on EPIC Interim Investment Plan

The California Electric Transportation Coalition (CalETC) appreciates the opportunity to provide feedback on the January 6, 2021 CEC workshop on a proposed interim plan for Electric Program Investment Charge (EPIC) funding. We greatly appreciate the time and effort it took to organize this workshop and the thoughtfulness of the proposed projects.

CalETC supports and advocates for the transition to a zero-emission transportation future to spur economic growth, fuel diversity and energy independence, contribute to clean air, and combat climate change. CalETC is a non-profit association committed to the successful introduction and large-scale deployment of all forms of electric transportation. Our Board of Directors includes representatives from: Los Angeles Department of Water and Power, Pacific Gas and Electric, Sacramento Municipal Utility District, San Diego Gas and Electric, Southern California Edison, Southern California Public Power Authority, and the Northern California Power Agency. In addition to electric utilities, our membership includes major automakers, manufacturers of zero-emission trucks and buses, electric vehicle charging providers, autonomous electric vehicle fleet operators, and other industry leaders supporting transportation electrification.

CalETC supports the CEC's focus on under-resourced communities and we recommend soliciting ideas from stakeholders on the types of criteria that would qualify a community as under-resourced or specifying that an under-resourced community will be those that fit the statutory definitions referenced on page A-7. Even if the statutory definitions are used, it would be valuable to solicit stakeholder feedback on the process of analyzing and identifying which communities will qualify.

We support Staff's inclusion of the topic of V2B/V2X in of draft research initiative number 7 and want to ensure it focuses on vehicle-to-grid technology that is not already commercially available, as well as avoid redundancy with other state policy and programs. Research initiatives should continue to focus on reviewing the technology available to allow safe, reliable, and cost-effective integration of V2B/V2X use cases. Additionally, we recommend cybersecurity be included in initiative number 7, and as appropriate, in the other draft initiatives. According to staff's presentation (slide 9), projects for transportation electrification (TE) and vehicle grid integration (VGI) have received less than 5% of the \$713 million in EPIC funds from 2012 to 2019. Given the CEC's focus on reducing greenhouse gases and air pollution, and the very large contribution to these problems from transportation emissions, we recommend more EPIC funds be allocated to TE and VGI in the future.

Finally, we recommend the CEC include the many recent developments on VGI in the final proposal to the CPUC and describe how the CEC will work closely with the CPUC, California Air Resources Board (CARB), US Department of Energy (USDOE), and the utilities to coordinate efforts on VGI to achieve the best results and avoid duplication with EPIC projects. Specifically, we recommend the inclusion of, and coordination on, the following:

- CARB's Low Carbon Fuel Standard recently enacted smart charging credits and low carbon intensity electricity credits monetize and provide greenhouse gas signals for smart charging and renewable integration. These credits are additive to the recently updated time-varying rates from the three IOUs that encourage residential and commercial charging at appropriate times.
- SB 676 proceedings for both the CEC and CPUC on VGI, emphasizing the broad definition of technology neutral VGI.
- The CPUC recently adopted decisions that direct up to \$45M for VGI pilots (including V2B), demonstrations, and studies. As well as a 10-year strategy on VGI (D-20-12-029) and potentially additional VGI (including V2B) funds for TE resiliency projects over the next decade and beyond (D-20-12-027).
- The Final Report of the VGI Working group (VGIWG) from June 2020, and the CPUC approved funding (D-20-12-029) to continue the next steps from the VGIWG.
- In May 2020, the CPUC opened a rulemaking (R-20-05-12) that is considering V2B issues and has a working group that is continuing to consider changes to Rule 21 (interconnections) for AC vehicle to grid (mobile inverters on EVs).
- The 2020 omnibus spending bill that was signed in December 2020 has funds for VGI programs at USDOE.

Thank you for consideration of our comments and do not hesitate to contact me if you have any questions.

Best regards,



Kristian Corby, Deputy Executive Director