

**DOCKETED**

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California Energy Commission  
RE: Docket No: 19-AB-2127  
1516 Ninth Street  
Sacramento, CA 95814

**Re: Comments on Vehicle-to-Grid Inverter List Workshop**

Dear Energy Commission Staff,

San Diego Gas & Electric Company (SDG&E) appreciates the opportunity to comment on the Vehicle-to-Grid (V2G) Inverter List workshop held by the California Energy Commission (CEC) on May 17, 2022.

SDG&E strongly supports the creation of a public V2G Inverter List that would be published and maintained by the CEC, and thanks the Energy Commission for its efforts to accelerate V2G. Such a V2G Inverter List would provide a comprehensive, statewide list of V2G inverters and will reduce uncertainty in the nascent V2G industry. In particular, a CEC-hosted V2G Inverter List would simplify utilities' efforts to interconnect V2G inverters and support the further integration of bidirectional electric vehicle (EV) charging equipment into utility EV infrastructure programs.

In response to the specific questions posed in the workshop notice, SDG&E recommends:

1. *Which certifications should the V2G Inverter List track at launch? UL 1741, UL 1741-SA, UL 1741-SB, or a combination thereof?*

The V2G Inverter List should track all relevant certifications and standards for V2G inverters, which will streamline Rule 21 interconnections for V2G inverters and help customers future-proof their EV charging acquisitions.

2. *To what extent should the V2G Inverter List attempt to accommodate onboard inverters (AC V2G) at launch, versus focusing on offboard inverters (DC V2G)?*

In the interest of producing a V2G Inverter List relatively quickly, the V2G Inverter List should initially focus on listing DC V2G inverters as the relevant standards to accommodate AC V2G have not yet been adopted. As AC V2G standards mature they can be incorporated into the V2G Inverter List.

3. *Should the V2G Inverter List track the model numbers of chargers that contain inverters, or the model numbers of the inverters themselves? If the former, how would the list accommodate onboard inverters? If the latter, how would a charger manufacturer prove that a listed inverter is indeed used in a particular charger model?*

SDG&E does not offer a recommendation in response to this question.

4. *Should any parameters besides UL 1741 certification be tracked as part of the V2G Inverter List? For example, connector type, communication standards, and so on?*

SDG&E recommends that the V2G Inverter List track all requirements for Rule 21 interconnections.

SDG&E thanks Energy Commission staff for hosting the V2G Inverter List workshop and commends the CEC for their efforts to drive V2G adoption forward.

Sincerely,

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