

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

Order Instituting Rulemaking to Consider
Alternative-Fueled Vehicle Programs,
Tariffs, and Policies

Rulemaking 13-11-007
(Filed November 14, 2013)

**REPLY COMMENTS OF GENERAL MOTORS ON ASSIGNED
COMMISSIONER'S RULING SEEKING COMMENT ON VEHICLE-
INTEGRATION COMMUNICATION PROTOCOL WORKING GROUP
ENERGY DIVISION STAFF REPORT**

JAMES HALL
JAMES TARCHINSKI
General Motors LLC
1121 L Street, Suite 700
Sacramento, CA 95814
jamie.hall@gm.com
james.e.tarchinski@gm.com

April 4, 2018

**REPLY COMMENTS OF GENERAL MOTORS ON ASSIGNED COMMISSIONER’S
RULING SEEKING COMMENT ON VEHICLE-INTEGRATION COMMUNICATION
PROTOCOL WORKING GROUP ENERGY DIVISION STAFF REPORT**

In accordance with the February 23, 2018 Assigned Commissioner’s Ruling (“ACR”) Seeking Comment on Vehicle-Grid Integration (“VGI”) Communication Protocol Working Group, Energy Division Staff Report in the above-captioned proceeding, General Motors LLC (GM) hereby submits these reply comments.

A. The Commission should not require the use of a specific communications standard at this time.

We recognize and appreciate the work undertaken by Commission staff, other state agencies, and VGI working group members to evaluate the technical details of existing communication protocols and assess which, if any, might be appropriate for the CPUC to require to be used in ratepayer-supported infrastructure. Following months of active engagement in the VGI Working Group, GM agrees with Energy Division staff’s determination that “it is not advisable to require the investor-owned utilities to only use a single protocol, or specific combination of protocols, for their infrastructure investments at this time.”¹ Several parties support this conclusion. For example, Greenlots states “we do not think it prudent at this point in the development of the market to pick winners and losers, or pick a pathway for picking winners and losers.”² We agree, and we note that other parties reached a similar conclusion.³

ChargePoint and Greenlots both correctly point out that the impact of any Commission requirement here will reach far beyond California, despite the seemingly narrow focus on utility-funded infrastructure in California.⁴ This fact underscores the need to “get it right” and not prematurely pick a winner.

¹ Staff Report, page 12.

² Greenlots, page 3.

³ See, for example Joint Parties, page. 5 and Tesla, page 2-3.

⁴ ChargePoint, page 2; Greenlots page 3-4.

B. Studies and large-scale demonstrations (including telematics) are needed to help stakeholders better understand the value of VGI.

Several parties highlight the need for additional work to help stakeholders better understand the value of VGI. The Joint Parties write that better understanding the value of VGI is the “most important part of the path forward,” and they correctly highlight the fact that “in order to make a business case and determine the best VGI communication protocol(s) to install on EVs, most automakers need a better understanding of the VGI benefits.”⁵ Similarly, Tesla states that the “value of VGI benefits must be further understood in order to make a business case for VGI and determine the most appropriate VGI communication protocol(s) for individual electric vehicles.”⁶ And ORA rightly notes that “If the value of these [VGI] benefits were distinctly defined it would help to enable prioritization of technologies and protocols.”⁷ We agree with these statements and have made similar comments in past letters and public discussions.

The Joint Parties provide detailed and valuable input on next steps for identifying the value of VGI. Specifically, the Joint Parties call for a “VGI value study on net benefits that examines promising services and benefit streams” as well as “Large-scale demonstrations...of promising use cases in several different charging-market segments...in order to get validation of the realizable benefits of VGI as well as costs of implementing VGI in real-world situations.”⁸ We support these recommendations and agree with Tesla that the demonstrations should include telematics-based solutions, as this is a viable and promising technology for VGI.⁹ Furthermore, we encourage the Commission to include actionable steps to evaluate the value of VGI benefits as part of any update of the VGI Roadmap, as recommended by multiple parties.¹⁰

⁵ Joint Parties, page 27.

⁶ Tesla, page 3.

⁷ ORA, page 3.

⁸ Joint Parties, page 27-28.

⁹ Tesla, page 8.

¹⁰ See Tesla, page 7-8 and Joint Parties, page 30.

Dated: April 4, 2018

Respectfully submitted

 /s/ James Hall

JAMES HALL
General Motors LLC
1121 L Street, Suite 700
Sacramento, CA 95814
916-208-9533
jamie.hall@gm.com