

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

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

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

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

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In accord with Assigned Commissioner Carla Peterman’s Ruling issued on February 23, 2018 (Ruling), Tesla, Inc. (Tesla) submits these reply comments on the California Public Utilities Commission (Commission) Energy Division’s Staff Report on the Vehicle-Grid Integration (VGI) Communication Protocol Working Group (Staff Report) and recommendations for the Commission to consider when evaluating programs to install certain transportation electrification infrastructure in future proposals from the investor-owned utilities (IOU).

I. DISCUSSION

Upon evaluating stakeholders’ opening comments on the Staff Report, Tesla continues to be supportive of Energy Division staff’s determination that based on stakeholder feedback and guidance, “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

Furthermore, we agree with the Joint Parties and other stakeholders that the value of VGI benefits must be further understood before determining the most appropriate level of prioritization for various VGI communication protocols.² Finally, we continue to support the exclusion of private access locations from the proposed EVSE hardware requirements.

¹ Staff Report, p.12.

² Joint Parties Opening Comments, p. 27; ORA Opening Comments, p.3; Kitu Systems Opening Comments, p.6.

a. It is premature for the Commission to adopt a communication protocol for the utilities' infrastructure programs.

As clearly articulated by the Joint Parties and the Staff Report, which reflects the evaluation of the working group, it is too early to implement a single existing protocol or combination of protocols for ratepayer supported infrastructure.³ Volkswagen, Audi, Porsche, Daimler, Lucid Motors, and IoTecha provide a different perspective noting that “if California is serious about being a world leader in E-Mobility, it is imperative that an EVSE-to-EV communication protocol be recommended.”⁴ Furthermore, they state that ISO/IEC 15118 has been the direction of industry for the last 5 years and that changing this will be a setback for the industry, including negatively impacting all stakeholders. While we recognize the extensive amount of effort that has gone into developing various communication protocols including ISO/IEC 15118, we disagree that California’s leadership in transportation electrification is tied to the adoption of a specific communication protocol. Siemens notes that its goal in transportation electrification is supporting policies that “drive EV adoption by lowering the total cost of ownership and significantly enhancing the consumer experience in buying, owning, and operating an EV.”⁵ We concur with this sentiment and continue to believe that this should be a key consideration when evaluating any future adoption of specific requirements for enabling VGI.

³ Staff Report, p. 29; Joint Parties Opening Comments, p. 7.

⁴ Opening Comments, p.3.

⁵ Siemens Opening Comments, p.2.

b. It is appropriate to exclude private access locations from the EVSE hardware requirements.

Most stakeholders find that it is appropriate to exclude private access locations from the EVSE hardware requirements currently.⁶ ORA and ChargePoint highlight that there is an opportunity for future grid integration capabilities for residential and other EVSE segments.”⁷ The Joint Parties also state that “low-cost and/or customized solutions for the home, fleet and private workplace charging segments should be explored first before any mandate” and provide several examples of options that are available today that can benefit EV drivers and the grid.⁸ As stated in our opening comments, we support excluding private access locations at this time given the lower cost options available that can meet the current and potential future needs.

II. CONCLUSION

As both a California-based manufacturer of electric vehicles (EVs) and provider of charging infrastructure for our customers, Tesla brings a unique perspective to the VGI discussion. We would like to reiterate that given the current level of EV deployment in California, the primary focus of the utilities’ infrastructure programs should continue to be on enabling transportation electrification and ensuring that any additional program requirements do not diminish the customer’s experience when deciding to make the switch to an EV. At higher levels of EV deployment, it will become increasingly important to ensure charging is aligned with grid needs. It will therefore be necessary to continue the discussions of the VGI working group and evaluate the most effective mechanisms for integrating solutions that benefit customers and the grid.

Respectfully submitted,

⁶ ORA Opening Comments, p.5; ChargePoint Opening Comments, p.4; Joint Parties, p. 21; Volkswagen, Audi, Porsche, Daimler, Lucid Motors, and IoTecha Opening Comments, p.2.

⁷ ORA Opening Comments, p.5; ChargePoint, p.4.

⁸ Joint Parties, p.22.

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