

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking Pursuant
to Assembly Bill 2514 to Consider the
Adoption of Procurement Targets for
Viable and Cost-Effective Energy
Storage Systems.

Rulemaking 10-12-007

EV GRID MOTION FOR RECONSIDERATION OF ALJ RULING ON MOTION FOR
PARTY STATUS

Paul Stith
Director, Business Development
& Regulatory Affairs
EV Grid, Inc.
809 San Antonio Road
Palo Alto, CA 94303
408.384.9455
pstith@evgrid.com
www.evgrid.com

October 7, 2013

EV GRID MOTION FOR RECONSIDERATION OF ALJ RULING ON MOTION FOR PARTY STATUS

EV Grid respectfully submits this motion, pursuant to Rule 11 of the *Rules of Practice and Procedure* (motions), for the Commission to re-consider its ruling on EV Grid's motion for party status, which was denied by ALJ Yip-Kikugawa's email ruling on October 1, 2013.

EV Grid, Inc. is a California-based company that develops and deploys Grid-Integrated Vehicle (GIV) technology and stationary distributed energy storage systems. Our [website](#) provides more information. We focus on the effects and opportunities represented by the 1.5 million electric vehicles targeted to be on the road in California by 2025 under the Governor's ZEV Action Plan. We project that the one million vehicles will, in aggregate, possess energy storage of between 15 GWh and 45 GWh (10 kWh to 30 kWh per vehicle), and will present as much as 4.5 GW to 22.5 GW of load (or capacity) to the grid (3 kW to 15kW charging or discharging power per vehicle). The ability to control the time, rate, and direction (charge or discharge) of EV charging allows the developing EV fleet to provide significant, reliable, and low-cost energy storage at low cost to ratepayers.

I. Discussion

EV Grid is active in developing technology solutions for Vehicle to Grid (V2G) and other EV grid integration issues. EV Grid is also involved in policy issues relating to EVs and stationary storage solutions around the country. If the potential capability to communicate, control, and make use of vehicle-based energy storage is not developed adequately, then the fleet will represent an additional load that may require additional grid resources, including storage, to offset its effects on grid operation. It is vital for California to, instead, adopt policies for integration of electric vehicles and the grid that reduce the ownership cost of the vehicles and reduce the cost of the infrastructure

required to support them.

EV Grid filed its motion for party status and comments on the Proposed Decision on Sept. 23, 2013. ALJ Yip-Kikugawa's Oct. 1 email ruling denying our motion for party status stated in full:

All,

This ALJ Ruling addresses the motions for party status of TAS Energy, filed on July 3, 2013 and EVGrid, Inc., filed on September 23, 2013. TAS Energy's motion was timely filed so that it could file comments on the Assigned Commissioner's June 10th Ruling. Accordingly, TAS Energy's motion for party status is granted. The following name shall be added to the service list under Party:

Kelsey Southerland

Director of Government Relations

TAS Energy

Email: ksoutherland@tas.com

EV Grid, Inc. filed its motion so that it could file comments to the Proposed Decision. EV Grid has not participated in developing the record for this proceeding and does not explain why granting party status at this late date is warranted. Accordingly, EV Grid, Inc.'s motion for party status is denied.

Amy C. Kikugawa

Administrative Law Judge

California Public Utilities Commission

[\(415\)7036256](tel:(415)7036256)

The ALJ correctly points out that we did not explain in our motion for party status why we are requesting party status at this late date in this proceeding. We correct that oversight here and request reconsideration of the ALJ's ruling in light of the additional information that the ALJ called for and that we provide here.

EV Grid recently hired Paul Stith as Director, Business Development and Regulatory Affairs. Stith has taken part for some time in the EV proceeding at the Commission (R.09-08-009) but not on behalf of EV Grid; nor was Stith active in the present proceeding (R.10-12-007) until he was hired by EV Grid. Upon his hiring, Stith urged EV Grid to become active on Commission proceedings relating to EV Grid's core services, including grid-attached storage and grid integration of EVs. It is for this reason that EV Grid is now requesting party status in this proceeding.

We also stress that EV Grid is a leader in V2G technology and policy development, and this experience will help the Commission to flesh out the best policies for EV grid integration and utilization as storage devices. In 2012, EV Grid entered into relationships with BMW, NRG, and the University of Delaware to expand ongoing work the University was conducting in the field of integration of grid-connected vehicles. The University was using electric vehicles to respond to grid commands and deliver grid regulation service to the PJM grid. The availability of MINI E electric vehicles from BMW and NRG's participation as an aggregator of the vehicles allowed the University's program, Grid on Wheels, to successfully participate in PJM's grid regulation market and generate ancillary services revenue starting in March 2013.

This is a first of its kind program in the world and California could learn from the PJM example. EV Grid's involvement in this cutting edge work should be considered an asset to the present proceeding.

II. Motion

Based on the foregoing discussion, we respectfully request that the Commission reconsider its ruling denying EV Grid's motion for party status. Per the ALJ's email ruling we have provided herein additional information describing why we are seeking party status at this time.

Respectfully submitted,

Paul Stith

_____/s/____

Director, Business Development
& Regulatory Affairs
EV Grid, Inc.
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pstith@evgrid.com
www.evgrid.com

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