

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 TO LATE-FILE OPENING COMMENTS ON PROPOSED  
DECISION

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 TO LATE-FILE OPENING COMMENTS ON PROPOSED  
DECISION

EV Grid respectfully submits this motion, pursuant to Rule 11 of the *Rules of Practice and Procedure* (motions), for permission to late-file opening comments on the Proposed Decision (“PD”).

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 and is available [here](#). 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 filed its motion for party status and opening comments on the Proposed Decision on Sept. 23, 2013. Our motion was denied by the ALJ. 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 10<sup>th</sup> 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](mailto: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. Kigawa

Administrative Law Judge

California Public Utilities Commission

(415) 703-5256

We have filed concurrently with the present motion a motion for reconsideration of the ALJ's ruling denying our motion for party status. Should the Commission grant our motion for reconsideration we are also requesting in this motion permission to late-file our opening comments on the PD, which we have attached to this motion. We have already served our comments via email, on the deadline of Sept. 23. Accordingly, no party will be prejudiced if the Commission grants permission to late-file our comments. Moreover, our opening comments reflect on issues that many parties, including the investor-owned utilities, have raised, specifically issues relating to allowing EV batteries to count toward utility storage procurement targets.

We mistakenly omitted a statement of our reasons for seeking party status so late in this proceeding in our previous motion for party status. Per the ALJ's direction, we have attempted to remedy this oversight in our motion for reconsideration that is filed concurrently with the present motion.

## **II. Motion**

Based on the foregoing discussion, we respectfully request that the Commission allow EV Grid to late-file opening comments on the PD.

Respectfully submitted,

Paul Stith

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& Regulatory Affairs  
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