

Small Business Utility Advocates (SBUA) Response to: What is it about VGI that has you focus your time and attention on it? What makes you think it is worth the time, attention, and money (including public funds) that could go into it?

**Rule 21 Working Group Four
Anti-Islanding (Issue 18)**

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VGI has countless benefits, including reducing GHG emissions from transportation, reducing the need for new grid infrastructure investments, improving the efficiency of electric grids, reduced renewable energy curtailment, and providing cost savings for vehicle owners. In fire-prone areas of California, EVs with VGI capability can provide mobile energy sources in real-time where needed when the grid is unavailable.

These benefits accrue to all ratepayers, including small business customers. Done correctly, VGI will afford economic value to cost-conscious utilities and their ratepayers in the long term.

Additional benefits for ratepayers, including small businesses, are also considerable, such as backup power, resiliency and reliability, and compensation for participating in demand response and ancillary services markets.

However, due to the costs of having an EV and EVSE which are VGI-enabled, VGI may be difficult to cost-justify for small businesses, as well as low and middle income residential customers. Policy makers need to determine whether subsidizing these costs for income-qualified ratepayers is justified.

According to Vehicle-Grid Integration Council, VGI system-balancing capabilities could provide value of up to \$15 billion by 2030 in California.¹ To determine whether a particular VGI use case provides net benefits, a study determining the full societal costs and benefits, is required. Alternatively, the levelized cost of energy coupled with levelized avoided cost of energy, including full societal benefits and costs, could provide a useful perspective.

SBUA further agrees with this chart from Strategen that sums up many of the VGI benefits and value streams:

¹ [VGIC \(vgicouncil.org/why-vgi\)](http://vgicouncil.org/why-vgi).

