

Vehicle Grid Integration (VGI) Working Group

Workshop #7

Final Report First Draft -- Comments and Resolutions

June 4, 2020



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Agenda



- 9:00-9:15 Introductions, agenda, objectives
- 9:15-9:30 Comments received, to acknowledge, process/principles
- 9:30-12:00 “Tier 1” controversies and resolutions (with a break)
- 12:00-1:30 Lunch
- 1:30-3:15 “Tier 1” continued if needed; then “Tier 2” (with a break)
- 3:15-3:45 SB676 – contributions of our work to further PUC action
- 3:45-4:00 Wrap up

Objectives of Workshop



- Develop clear guidance for Gridworks on writing the second draft of the Final Report
- Review and discuss items needing resolution based on comments to first draft
- Come to group resolutions on proposed items
- Discuss SB676 connection to VGI Working Group results and Final Report

680 comments received from 25 participants on the first draft



- Big picture comment (65 comments)
- Policy delete/move/combine (24) -- related to consolidation and re-categorization of recommendations
- Policy criteria for green/red/black/purple (42) -- related to "strong agreement" etc.
- Policy descriptions/comments (59) -- many additional comments made on the policies in Chapter V and database
- Confirm prior WG agreement (13) --items that may need to be confirmed against prior agreements
- Change or delete after confirm w/WG (84) -- items of a significant nature or may lead to disagreement
- Organization (45)
- Language/consistency (25)
- Missing/to add (180)
- Wording/meaning (90)
- Difficult to read/rewrite (19)
- Good to keep (7)
- Fact check (9)
- Typos (18)

Some appreciation



“Thanks for all of your hard work on this excellent draft report - I am convinced that the final report will be an exceptionally valuable resource used by the CPUC and around the world” – Ed Pike, CPUC

“A big thanks to you and your team for this massive effort!” – Kristian Corby and Dean Taylor, CalETC

“Thank you for your work on this draft. I appreciate that this was a substantial task completed under extreme time pressure and difficult circumstances” – Taylor Marvin SDG&E

“Your group is doing an exceptional job of pulling together such a wide variety of opinions and perspectives!” – Ted Howard, SBUA

“I think the draft report was good at capturing the discussions of the working group.” – Naor Deleanu, Olivine

“It really made a world of difference and I think we received a lot of useable information.” – Stephanie Palmer, CARB

Feedback that we want to acknowledge and will handle, but won't address today



- Very different Executive Summary and more narrative
- Need for a a “caveats” section where we recognize what the report does not address, such as barriers to customer adoption, cost-benefit analysis, value relative to other DERs
- Finish survey response quality control, and revisions and corrections to policy recommendations in report and database
- Work of Subgroups B, C and D that could continue after June 30 with publicly funded analytical support
- Suggested additions to policy database fields (no changes will be made)
- Number of additions, such as list of contributing organizations, need a summary of recommendations, add to and clean up references
- Annex 10 (*Linkages Between Policy Recommendations and Use Cases*) is not ready and will be removed

Recognizing three different audiences



- Commissioner – 2 hours max
- Judge – 8 hours max over multiple days
- VGI Professionals (“The World”) – Variable time and needs, including methodology and data

Overall caveat on agreement/consensus



This report does not address every aspect of VGI, but rather provides answers to the three scoped Commission questions as collective input to, and starting point for, Commission rulemaking on VGI. Recognizing this report serves as a starting point, it provides a collective expression of the Working Group rather than an account of every party's position on every issue. *Some parties disagree with some parts of the report, but agree the report provides a reasonable foundation.*

Final Report Process and Principles



- We are finishing by June 30 no matter what
- We can't extend the work of Subgroups B, C, or D from this point forward. That is, no new material or inputs. There were a number of comments that related to further work or extensions of past work. Example: add an additional field in the database on public funding. Rather, such items from comments could be listed as "suggestions for further work" somewhere.
- Not all suggestions for added wording or explanations can be incorporated, Gridworks will do its best to address the most important wording additions.
- If there are still disagreements by our third draft, we may have to note somehow in footnotes or elsewhere that some parties disagreed on specific points or conclusions.
- The third draft will have very tight turn-around of just a few days, and we will not be able to address substance, only verify agreed responses to previous comments and focus on grammar and mechanics, and note rather than resolve any remaining disagreements.

“Tier 1” controversies and resolutions from the comments – must resolve today



1. Criteria for sorting policy recommendations into green/black/purple/red
2. Policy recommendations (109) revisions to wording, deletions and re-categorizations
3. How to present and organize Section V on PUC Question (b) policy recommendations, including incorporating policy survey comments (Q4)
4. How to present and organize Section VI on PUC Question (c) DER comparisons, including whether to provide any “answer” or just “how the PUC should pursue an answer”
5. PUC Question (a) conclusion that “all scored use cases can provide value now”; and including and documenting use-case subsets including Prime Strict and Prime Flex
6. Structure of report and degrees of summary and synthesis

“Tier 2” controversies and resolutions from the comments – address today as possible



7. V2G meaning includes all V2X?

8. Use “LSEs” throughout rather than “IOUs and other LSEs”

9. Grouping the 11 policy categories to show that collectively its comprehensive

10. “Change or delete after confirming with Working Group” (84 comments total with this classification)

11. “Missing/to add” and “Wording/Meaning” (270 comments with these classifications)

12. Other?

1. Criteria for sorting policy recommendations into green/black/purple/red (classifications)



- Many comments received on criteria, as well as comments on changing classifications of individual recommendations.
- Existing criteria were a straw device, using aggregate medians, to come up with a first-cut of about 30 recommendations (“strong agreement”, “divergence of agreement and disagreement”, “some agreement or mostly neutral”, “CPUC says already underway in other proceedings”)
- PG&E and ENGIE Impact have proposals for criteria – both are consistent in looking at the Q1 survey scores recommendation-by-recommendation rather than comparing to some aggregated average or median, and both provide five classifications. But each uses different mathematics and classification language.
- Proposed resolution:
 - (a) Choose either PG&E or ENGIE Impact mathematics
 - (b) Language can be adjusted, don’t need to resolve today
 - (c) Second round of non-mathematical adjustment based on comments to the second draft, with justifying remarks, for policies that parties believe should be moved to a different classification
 - (d) All classification comments received on first draft will be deferred to second draft once the new criteria are applied and presented in the second draft.

2. Policy recommendations revisions to wording, deletions and re-categorizations



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- Many re-wordings and further comments on policy recommendations were provided, some by the original submitters, some by others
- Several deletions and mergers proposed by original submitters, a few of which were missed in the last round, plus additional new ones
- A number of proposed moves from one category to another
- Comment: Additionally, I anticipate that WG participations might provide comments on the policy recommendations either in Section V, in the Annex, or in the Database, and that those comments should be cross-referenced accordingly.
– Amanda Myers
- Proposed resolutions:
 - (a) Re-wordings by original submitters will be made
 - (b) Deletions and mergers by original submitters will be made
 - (c) Policy category moves will be made if confirmed now
 - (d) Re-wordings and further comments by others will be added to the survey comments database but will not change the policy recommendation wordings

Group A:

Wording changes suggested by submitters



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1.10 Dean Taylor

Old: “Low cost integration solutions: TOU rates designed for EVs with high levels of participation”

New: “Improve Design Optional Residential and Commercial TOU rates designed to encourage EVs (e.g., whole house rate), fund outreach efforts on the rate, and set target to secure with high 60% level of participation.”

1.15 Amanda Myers

Old: Prompt CPUC approval of time-varying EV rates applications

New: Expand the definition of eligible customer-generator under current NEM tariff option to include customers that own and/or operate EVs and/or EVSE with bi-directional capabilities.

2.02 John Wheeler

Old: V2G systems become eligible for some form of SGIP incentives. One or several budget categories for V2G systems could be established along with residential, commercial, equity, etc. Large scale, commercial pilots could be used to develop the program.

New: Part two of a two-step recommendation that depends on the first part (V2G pilot) being successful enough...V2G systems become eligible for incentives in order to create a "level playing field" for DERs that provide similar services. The current SGIP program could inform V2G incentive structure.... For the first step, assessing potential incentive structures could be part of a larger scope for broader V2G pilots or be added to Fermata policy recommendation 7.04.

6.01 Amanda Myers

Old: Require that electric buses funded under the School Bus Replacement Program have managed charging and V2G functionality. Continue to provide funding for demonstration of V2G market participation with future school bus pilots.

New: Delete first sentence

10.05 Dean Taylor

Old: “State agencies should recognize that stakeholder's specialized VGI staff resources to support all these proceedings are limited”

New: The six State agencies should recognize that stakeholder's specialized VGI staff resources are limited and avoid workshops and hearings on the same day, and hold no more than 2-3 VGI and TE events per month.

Group B: Wording changes suggested by others



1.02 - Dean Taylor

1.06 - Dean Taylor

1.12 - Marc Monbouquette

1.13 - Ed Pike

1.14 - Dean Taylor

1.14 - Ed Pike

1.16 - Ed Pike

1.18 - Taylor Marvin

1.19 - Dean Taylor

2.05 - Marc Monbouquette

2.24 - Dean Taylor

3.01 - Dean Taylor

3.02 - Dean Taylor

4.02 - Dean Taylor

5.02 - Maria Sanz Moreno

6.02 - Stephanie Palmer

6.03 - Ed Pike

6.04 - Ed Pike

6.04 - Dean Taylor

6.05 - Dean Taylor

6.06 - Dean Taylor

6.06 - Maria Sanz Moreno

6.06 - Ed Pike

6.08 - Stephanie Palmer

6.08 - Maria Sanz Moreno

6.09 - Ed Pike

7.02 - Stephanie Palmer

7.03 - Maria Sanz Moreno

7.12 - Dean Taylor

8.03 - Dean Taylor

10.06 - Dean Taylor

11.02 - Ed Pike

Group C: Deletions by Nuvve (Either missed during consolidation (superseded) or commented during survey to delete, or subsequently decided to delete in consultation with PUC)



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1.03: Apply "Station Power" concept to V2G. Station Power is the idea that power purchased to operate generating facilities (or storage) can be purchased at wholesale, while energy needs at the site more broadly for purposes other than actually running the generator must be paid at retail rates.

1.14: Credit for export for V2G/storage

2.01: Require utilities to broadcast signals to a DER marketplace of qualified vendors (curtailment and load)

2.02: V2G systems become eligible for some form of SGIP incentives. One or several budget categories for V2G systems could be established along with residential, commercial, equity, etc. Large scale, commercial pilots could be used to develop the program.

3.02: Allow telemetry at aggregation level

3.06: Allow 100 kW threshold bid for A/S

6.05 : Adopt interim procedures for validating current limiting functionality in smart charging

6.06: Pre-wiring and preliminary interconnection of V2G

6.10: Enable interconnection of AC mobile inverters

7.12: Pilots demonstrating connection capacity sharing

8.03: Full fixed cost connection

10.08: Waive second interconnection of V2G

Group D: Mergers by submitters



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Combine 1.16 and 1.14: Ed Burgess

1.14 : Credit for export for V2G/storage

1.16 : NEM credit for V2G exports

1.16 suggested revised language from prior round (Ed Burgess): “Expand the definition of eligible customer-generator under current NEM tariff option to include customers that own and/or operate EVs and/or EVSE with bi-directional capabilities. In addition to an EV export bill credit (under NEM or another framework), a supplemental credit should be considered for the environmental component, such as one based on similar tools implemented for the SGIP GHG signal to determine marginal emissions rate (i.e., WattTime).”

Combine 7.10 with 7.08: Dean Taylor

7.08 : Use EPIC funds for an on-going program to convene VGI data experts on a wide array of topics, demonstrations, data programs, and studies

7.10 : Detailed independent, third-party VGI net value analysis should be conducted on the promising use cases

Combine 1.04 with 8.02: Ed Pike

1.04: Establish EV TOU rates that don't require separate/submetering (significant customer cost). Allow vehicle data to be used as input to utilities for settlement to customer. Also- having a standardized TOU rate format across IOUs and other LSEs would be helpful.

8.02: Finalize submetering protocols/standards to increase accessibility to more favorable EV TOU rates.

1.12: Alternative Approaches to Submetering for TE. Given the many challenges faced by EV submetering over the last decade, a re-examination is needed....[T]he use of whole house, time variant rates and AMI meters have captured many of the proposed benefits of submetering (e.g. off-peak use of electricity). Whole house rates are applicable for all types of DERs.

Group D: Mergers (continued)



Merge 2.04, 2.17, 2.18 and 6.05: Marc Monbouquette

(“all aim to open up new value streams that can be captured by EV load management technology, and also provide an additional type of “incentive” or benefit-enabler sought in 2.18”)

2.04: Enable customers to elect BTM load balancing option to avoid primary or secondary upgrades, either if residential R15/16 exemption goes away, or as an option for non-residential customers

2.17: Enable customers, via Rules 15/16 or any new EV tariff, to employ load management technologies to avoid distribution upgrades, and focus capacity assessments on the Point of Common Coupling

2.18: Incentivize multiple EVs using a single charging station (e.g., chargers that power share / sequence) to keep charging load spread across as many vehicles as possible.

6.05: Adopt interim procedures for validating current limiting functionalities in smart charging

Combine 2.07 and 3.02: Mauro Dresti

2.07: Create a strategic demand reduction performance incentive mechanism, include EVs as technology that can reduce and shift peak demand.

3.02: Allow telemetry at aggregation level

Combine 4.01 and 4.04: Ed Pike

4.01: Initiate a voluntary task-force to help gather, model, and analyze data related to these use-cases' benefits and costs. Prioritize the analysis of these use-cases within the VGI Data Program initiative proposed by CalETC

4.04: Perform detailed cost-effectiveness analysis for specific VGI use-cases in programs/measures that are ratepayer funded, in order to quantify the impact on EV customer, ratepayer, utility, and society at large.....

Combine 1.01, 2.20, 7.06: Energy Innovation, Nuvve, and Honda recently consolidated recommendations related to stationary batteries co-located with DCFC We came up with the following recommendation:

Consider funding opportunities and rate design reform for stationary batteries co-located with DC fast chargers to reap grid benefits and potentially improve economics of near-term DCFC installations with low utilization.

Group E: Move to New Category



1.04, 1.12 move to Category 8 along with 8.02 for submetering: Ed Pike

1.04 Establish EV TOU rates that don't require separate/submetering (significant customer cost). Allow vehicle data to be used as input to utilities for settlement to customer. Also- having a standardized TOU rate format across IOUs and other LSEs would be helpful.

1.12 Alternative Approaches to Submetering for TE

4.05 move to Category 7: Mauro Dresti

Increased pilots exploring shared charging infrastructure for commuter-based fleets, both public and private...

5.02 move to Category 7: Mauro Dresti

Pilot funding for EV backup power to customers not on microgrids....

7.01 move to new Category : Karim Farhat

Dedicate specific efforts that allow TNC/Rideshare drivers to reduce their costs by benefiting from utility and other publicly-funded programs and rates

7.02 move to new Category : Karim Farhat

Improve the allocation of LCFS credits as a mechanism to capture the benefits of GHG Reduction and Renewable Integration....

7.03 stay in Category 7 (Mauro Dresti) or move to Category 4 (Ed Pike)

Leverage EPIC funding to pilot some use-cases in order to: (1) better understand realistic costs and implementation challenges; (2) identify concrete ways to reduce cost and streamline implementability...

7.10 move to Category 4: Ed Pike

detailed independent, third-party VGI net value analysis should be conducted on the promising use cases because Subgroup B was not able to do this

10.08 move to Category 6: Ed Pike

Waive second interconnection of V2G

Group F: Change timeframe

- Policy recommendations (10.12, 10.13, 10.14, 10.15) could probably be achieved in a short-term time frame (Maria Sanz-Moreno)
- CalETC recommends that the joint IOU policy recommendations be moved from mid-term to short-term including 1.15, 5.03, 6.11, 7.13, and 9.03 as these are really on-going actions that also apply to short-term. (Dean Taylor)



3. How to present and organize Section V on PUC Question (b) policy recommendations, including incorporating policy survey comments (Q4)



- Comment: The report itself could benefit from a summary of near term and longer term recommendations listed with expected benefit or barriers removed. –Peter Klauer
- Comment: Overall this report should only present recommendations when they were the consensus of the group, not present lists of opinions from individual participants. –Taylor Marvin
- Comment: The descriptions of recommended policies in the policy category sections are far too detailed, and mention specific comments by parties as if they are endorsed by the WG. Right now these read like a grab bag of sometimes contradictory policy recommendations with no qualification for which were supported by the group and which were not. In general this section does not read as completed. –Taylor Marvin
- Comment: This section is unclear and difficult to read. – Maria Sanz Moreno
- Comment: The color coding helps A LOT! Lots of information in this section – would it help to condense and focus if strong agreement, short-term recommendations are kept in report and the others moved to the appendix? -- Bill Ehrlich
- **Proposed resolutions:**
 - (a) Substantially re-write as an integrated narrative and focus on policy action, not on documenting the work we did
 - (b) Utilize survey comments (Q4) after each group of policies (i.e., Category 1 green) to help explain divergences or agreements (but there may be a great deal of disagreement on which comments to use)
 - (c) Delete the “summary of recommendations” paragraphs at the start of each Category
 - (d) Keep medium-term and long-term separate (where?)
 - (e) Keep “short” versions of policy recommendations for tables and text in this section, with “long versions” in the annexes and database

4. How to present and organize Section VI on PUC Question (c) DER comparisons, including whether to provide any “answer” or just “how the PUC should pursue an answer”



- Comment: I suggest substantially reducing this section (to a page at most), essentially explaining the CPUC question, why would could not answer it, and mentioning the three paths for future work. It should not endorse any single path, which the group did not agree on. I suggest that Table 17 is the only substantial part that we keep from this section. –Taylor Marvin
- Comment: I do not believe this report should summarize third-party work. As it is a regulatory requirement this report should explicitly state both here and in the summary that we did not answer this PUC question. – Taylor Marvin
- Comment: Use the answers that all organizations submitted to the question of “why do you think VGI is important” as quotes lists. Nice motivation for anyone reading the report. – Karim Farhat
- Comment: CalETC recommends that work of subgroup B and D should be done after June 30 in a quantitative way as was originally envisioned at the start of the VGIWG phase 2. The complicated nature of the assignment, the tight deadlines, the reliance on volunteer participants and the lack of paid experts contributed to this outcome.
- Proposed resolution:
 - (a) Remove all reference to any specific study, just make a list of published references
 - (b) Include Tables 17 and 18 and explain the three possible approaches, including a shortened Table 18 example of the qualitative approach
 - (c) Include the list of methodological issues noted by parties on Line 1915
 - (d) Include answers to “Value of VGI” question in the report Introduction section and also give a complete set of answers provided by parties to this question in an annex (technical report) and/or database

5a. PUC Question (a) conclusion that “all scored use cases can provide value now”



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- Comment: This statement is not accurate. It should be deleted. There was no conclusion from the Working Group on this. The sentence referenced here refer to discussions at the conclusion of Workshop #3 only, but it does not represent a consensus agreement by all Working Group participants. If not deleted, agreeable alternative phrasing can be:

“All parties agreed that use-case scoring was very useful to assess VGI value. In addition, the WG agreed that all fully scored use-cases can provide some benefit at some point in time. While there was no formal consensus agreement within the Working Group on what exact use-cases can provide value now, some parties proposed alternative ways to prioritize use-cases based on value.” – Karim Farhat
- Proposed resolutions:
 - (a) Emphasize further and prominently that the “subsets” provide several starting points for “providing value now” and describe why each subset was developed and justified, not just what each subset is
 - (b) Provide a statement of disagreement from those parties wishing to be included along the lines of ENGIE Impact’s comment

5b. Including and documenting use case “subsets” including Prime Strict and Prime Flex



- Comment: I suggest cutting all mention of the "prime strict" etc. categories as these are not clearly explained and were not presented to the entire WG. – Taylor Marvin
- Proposed resolutions
 - (a) Include all subsets as originally defined in January workshop, in annexes, and describe in the main text why each of these subsets were developed in the way they were, the justification for developing each of them, based on party submitted comments during Subgroup B, and what value they convey
 - (b) Do not use any specific subset as an “illustration”
 - (c) Can parties agree to include the Prime Strict and Prime Flex subsets in the annexes?

Recognizing three different audiences



- Commissioner – 2 hours max
- Judge – 8 hours max over multiple days
- VGI Professionals (“The World”) – Variable time and needs, including methodology and data

6. Structure of report and degrees of summary and synthesis



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- Comment: Overall, the report is very process-oriented, i.e. it reflects the working group procedures. But, it seems the report should be structured to answer the main CPUC working group questions, synthesizing the working group tasks and outcomes as needed to answer the questions. Currently I don't think this report reads as a resource for someone looking to learn about VGI opportunities in CA.... if we want to increase inclusivity I think it can be made more accessible to a broader audience. – Amanda Myers
- Comment: Overall this report needs to be substantially refocused and edited down, in order to provide a comprehensible story accessible to readers who did not participate in the process. -- Taylor Marvin
- Comment: The entire report should be framed around answering the CPUC questions. These should be established straightway. All of the work we did was in response to these questions and the WG's output does not necessarily apply in other contexts. –Taylor Marvin
- Proposed resolutions:
 - (a) high-level 2-page Executive Summary for legislators and commissioners
 - (b) scaled-down (i.e., 25-pages) report filed for the judge – focus on answers to 3 questions, narrative, caveats, and some synthesis and summary (i.e., party survey comments for policy recommendations, and use case subset descriptions)
 - (c) online-only 100-page technical report (annexes plus table of contents) that is not filed on June 30. Very factual, documenting all our work for the world, no synthesis and no summary, just our objective results and methodologies

7. V2G meaning includes all V2X?



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- Comment: The term V2G is being used in some cases where it could be V2H, V2B, and V2L as well. I think there needs to be consistency in how this is referred to (such as using V2X). In many policy recommendations V2G was used and it was noted that in that recommendation it is referring to all of the above bi-directional activities, if this is the wording to be used throughout the final report then I think we should define/clarify in executive summary or introduction that this is what V2G is referring to – Sarah Woogen
- Proposed resolutions:
 - (a) use V2G throughout and explain in beginning it can also mean V2H, V2B, V2L
 - (b) Use a combination of V2G/V2H etc. where appropriate
 - (c) Use "V2X" throughout

8. Use “LSEs” throughout rather than “IOUs and other LSEs”



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- Comment: suggest rather than saying "CCA's in addition to IOUs" and"other programs by IOUs and other LSEs" that there is consistent reference to LSE's throughout the document. At the front end of document there should be a definition of LSE's which includes...--Jessie Denver
- Comment: Use Load Serving Entity in doc where applicable rather than saying "IOUs and other LSEs". IOUs are LSEs along with CCAs, MOUs, etc. IOUs are also EDUs. Upfront in doc (Intro) define EDU and LSE, and give examples for each (ex. EDU includes investor owned utilities that manage transmission and distribution systems. ex. LSE includes IOUs, CCA, MOUs, etc). –Jessie Denver
- Proposed resolutions:
 - (a) use “LSEs” throughout OR
 - (b) distinguish where “utility” or “IOU” should be used (CPUC jurisdiction only) vs. where “IOUs and other LSEs” should be used (how to accomplish this?)

9. Grouping the 11 policy categories to show that collectively its comprehensive



- Comment: The report should group the 11 policy categories to show that the individual policy recommendations collectively form a broad and comprehensive plan and not just fragmented action items. –Ed Pike
- Proposed resolution: This could be accomplished through a rigorous edit reviewed during the second draft, but what comes out won't be what went in verbatim. The organizing clarifying and streamlining required will come at the cost of exactly reflecting input of parties. There may be disagreements on the second and third drafts that we won't have time to resolve before our deadline.

10. “Change or delete after confirming with Working Group” (84 such comments)



Examples:

2110 “VGI Council provided the Working Group a Full paper on the value of VGI” Comment: maybe include as a reference but I’m not sure it’s appropriate to include the full description here in the report when it wasn’t developed by the WG. –Bill Ehrlich

892 The terms public funds and ratepayer funds are not interchangeable. There needs to be a definition at the beginning of this section drawing the distinction. One key difference is that using public funds does not create cost-shift, whereas using ratepayer funds for a measure that is not cost effective does. – Maria Sanz Moreno

891 Regarding the call-out box on public funds (page 29) CalETC recommends that the box only be the first three paragraphs and cover the topic of what are public funds. The last two paragraphs (lines 918 to 933) on page 29 get into a much broader topic of how to allocate public funds, and this topic should be deleted on page 29 and covered elsewhere... --Dean Taylor

1501 (on 6.11) Again, I thought standards were out of scope of this working group effort. –Alex Leumer

315 Did SB 676 really direct this process? That seems like a liberal interpretation of the law that passed. –Alex Leumer

823 Table 13 This table is too complex for the report body -- a reader is not going to cross-reference specific use cases with these strategy tags. –Taylor Marvin

11. "Missing/to add" and "Wording/meaning" (270 comments with this classification)



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- This is a large number of additions and re-wordings, many of which do not specify exact new language but rather are of the form “please add that”, or “please add something about...”, or “please elaborate on...”
- **Proposed resolutions:**
 - (a) Respond to as many of these as possible, consulting with PUC on which ones may be the highest priority
 - (b) Document as a separate list which ones were not responded to, and parties may comment on second draft if something was considered very important and not yet responded to

SB676 – contributions of our work to further PUC action



- How should this report inform CPUC implementation of SB 676? Which recommendations are fully actionable to meet the legislative directive in the near-term, and what issues need more investigation/clarification?
- Do stakeholders see a need for another workshop or set of party comments/replies to transition the final VGI WG recommendations into SB 676 guidance? If so, what are the top three issues you'd like to discuss in that separate workshop or comment effort? (Note that we can provide some ideas to seed the discussion if you don't get ideas in advance)

Final Report Schedule



	Issued	Comments due	Discuss
First draft	5/19	6/1	Workshop on 6/4
Second draft	6/9	6/16	Call on 6/18
Third draft	6/22	6/26	Call on 6/25
Final submission	6/30		

Next steps



Thanks!



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