March 3, 2026

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Re: Joint Comments on Draft Resolution E-5452. Southern California Edison Orchestrated Charging and Advanced Resiliency for Distribution Vehicle Grid Integration Proposal Using Low Carbon Fuel Standard Holdback Revenue

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Dear Sir or Madam:

Pursuant to the provisions of General Order 96-B and the Comment Letter accompanying Draft Resolution E-5452, the undersigned organizations respectfully submit these comments on the proposed approval with modifications of Southern California Edison's ("SCE") Advice Letter 5536-E, *Southern California Edison's Request for Approval to Update Its Low Carbon Fuel Standard Holdback Revenue Return Implementation Plan to Include a New Vehicle Grid Integration Program and to Qualify for Exemption from Public Utilities Code Section 851*("Advice Letter").

I. INTRODUCTION.

The undersigned organizations support approval of the Orchestrated Charging and Advanced Resiliency for Distribution ("ORCHARD") program. We thank the Commission for approving ORCHARD's managed charging component and appreciate the Commission's recognition that coordinated EV load management can provide important grid and ratepayer benefits.

However, we respectfully urge the Commission to also approve SCE's proposed incentives for bidirectional charging equipment.

II. THE JOINT PARTIES URGE THE COMMISSION TO APPROVE ORCHARD'S INCENTIVES FOR BIDIRECTIONAL CHARGING EQUIPMENT.

Bidirectional charging builds on and enhances the benefits of managed charging. While managed charging shifts or reduces EV load during constrained periods, bidirectional charging systems allow EVs to both reduce load and discharge power from their EV back to the home and/or grid. This dual functionality can deliver deeper peak reductions, improve local distribution reliability, and unlock incremental system value beyond load management alone, as demonstrated by several foundational

studies from the CPUC, PG&E, Stanford, E3, Union of Concerned Scientists, Brattle, EPRI, Lawrence Livermore National Laboratory, and UC Irvine, among others.[1]

Bidirectional charging systems are not limited to home backup power applications. Customers can use their EVs for peak shaving, participation in demand response programs, and emerging export compensation tariffs. As California continues expanding compensation pathways for EV exports, enabling grid-parallel functionality today ensures customers are prepared to participate in programs designed to deliver measurable grid benefits.

A key barrier to enabling these grid services is the high upfront costs facing customers, including the $800 Rule 21 interconnection application fee for small systems. For smaller customers, this fee represents a significant share of the incremental cost of activating grid-parallel bidirectional charging functionality. SCE's proposed $800 incentive is a targeted and reasonable approach to removing this barrier, and the additional incentives for income-qualified customers support equitable access to advanced grid technologies.

III. CONCLUSION.

As EV adoption marches on, approving ORCHARD's bidirectional incentive component would help unlock additional reliability value, support the state's vehicle-grid integration objectives (including the imperative to "maximize feasible and cost-effective VGI" under SB 676), and yield benefits for ratepayers.

For these reasons, we respectfully request that the Commission modify the Draft Resolution to approve SCE's bidirectional charging incentive proposal.

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[1] See, for example: California Public Utilities Commission ("CPUC"), Draft Inputs & Assumptions, 2024 – 2026 Integrated Resource Planning (IRP) at p.111. https://www.cpuc.ca.gov/-/media/cpuc-website/divisions/energy-division/documents/integrated-resource-plan-and-long-term-procurement-plan-irp-ltpp/2024-2026-irp-cycle-events-and-materials/2025_draft_inputs_and_assumptions_doc_20250220.pdf; PG&E EIS Part 2 at 34; Samantha Houston, David Reichmuth, and Mark Specht. *Harnessing the Power of Electric Vehicles: Vehicle-Grid Integration for a Cleaner, Cheaper, More Reliable California Electricity System.* June 2025. Union of Concerned Scientists. https://doi.org/10.47923/2025.15888. Accessed January 13, 2026; Sonia Martin, William A. Paxton, and Ram Rajagopal. *Residential vehicle-to-grid profits under dynamic pricing: The role of real-world charging behavior.* March 2026. Advances in Applied Energy. https://www.sciencedirect.com/science/article/abs/pii/S0360544225024156?via%3Dihub ; William Goldsmith et al., *The Utility Playbook: Turning EV Grid Risk into a $30 Billion Opportunity*. 2025. EV.Energy and Brattle. https://www.ev.energy/en-us/resources/value-of-managed-charging ; Sunil Chhaya, PhD, et al. *Distribution System Constrained Vehicle-to-Grid Services for Improved Grid Stability and Reliability.* CEC. March 2019. https://www.energy.ca.gov/sites/default/files/2021-06/CEC-500-2019-027.pdf ; Jonathan Donadee et al. *Potential Benefits of Vehicle-to-Grid Technology in California: High Value for Capabilities Beyond One-Way Managed Charging*. Lawrence Livermore National Laboratory. IEEE Electrification Magazine. June 2019. https://www.osti.gov/pages/biblio/1557041 ; Brian Tarroja and Eric Hittinger. *The value of consumer acceptance of controlled electric vehicle charging in a decarbonizing grid: The case of California.* UC Irvine. Energy (Volume 229). https://www.sciencedirect.com/science/article/pii/S0360544221009397

Respectfully submitted,

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