

**BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF CALIFORNIA**

Order Instituting Rulemaking to Continue  
the Development of Rates and Infrastructure  
for Vehicle Electrification.

Rulemaking 18-12-006

**COMMENTS OF  
THE CALIFORNIA INDEPENDENT SYSTEM OPERATOR CORPORATION**

**I. Introduction**

The California Independent System Operator Corporation (“CAISO”) provides comments supporting Commissioner Clifford Rechtschaffen’s Proposed Decision (“PD”) adopting plug-in electric vehicle submetering protocols and electric vehicle supply equipment (“EVSE”) communication protocols, issued on June 30, 2022.

**II. Comments**

The CAISO appreciates the opportunity to comment on the PD, which takes important steps for zero-emission vehicles and vehicle-grid integration technologies. Specifically, the PD proposes to adopt submeter accuracy standards of one percent accuracy tolerance and two percent maintenance for alternating current (“AC”) EVSE submeters.<sup>1</sup> In the absence of meter accuracy standards set by the local regulatory authority, the CAISO’s Business Practice Manual for Metering<sup>2</sup> requires distributed energy resource (“DER”) aggregations that are on a single-phase service connection to meet a 0.2 percent accuracy.

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<sup>1</sup> Proposed Decision at 15.

<sup>2</sup> Attachment G, Section III.

The CAISO appreciates the Commission’s need to balance the integration of new grid resources with costs and technical requirements.<sup>3</sup> However, the CAISO’s metering accuracy standard did not expressly contemplate application to EVs or EVSEs. The CAISO has neither the experience nor the data to determine whether the relaxed standard proposed by the PD could lead to significant inaccuracies.

It is the CAISO’s understanding that under the PD, the relaxed one-two percent standard applies only to behind-the-meter submetered devices. This limitation mitigates potential negative impacts, such as inaccuracy in billing and settlement. At this time it is unclear to the CAISO whether the relaxed accuracy standards are appropriate for other DERs or aggregations of different distributed technologies, including those aggregated with EVSE. The CAISO believes the Commission should maintain the 0.2 percent accuracy standard for non-EVSE resources until parties have experience with the PD’s relaxed standards. The CAISO encourages the Commission to collect sufficient data to monitor the impacts of the relaxed standard on billing and customer confidence, and whether adopting this PD—or expanding it—provides meaningful benefits for customers and the grid.

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<sup>3</sup> Relaxing the metering accuracy standards for EVs may reduce vehicle grid integration costs and enable a targeted approach to unlock the potential value of EV’s on the grid. Reduced EV submetering costs can speed the introduction of grid operations-aligned retail rates to incentivize EV owners to charge their vehicles in ways that increase grid reliability and reduces costs of operating the electric grid. Lowering the submetering accuracy standard may also enable a more cost effective way for demand response aggregators to utilize the CAISO EV performance baseline methodology, which can distinctly measure and settle the performance of EVs participating in the CAISO’s demand response market offerings.

### III. Conclusion

The CAISO supports the Commission's efforts in this proceeding, and appreciates the opportunity to work collaboratively with parties.

Respectfully submitted,

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