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25-12031

Public Utilities Commission of Nevada
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In accordance with NRS Chapter 719,
this filing has been electronically signed and filed
by: /s Grace Pratt

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VehicleGrid Integration Council

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF NEVADA**

Application of Nevada Power Company d/b/a NV Energy, filed under Advice Letter No. 562, to revise Tariff No. 1-B to modify Generating Facility Interconnections Rule No. 15 pursuant to the Order issued in Docket No. 24-05041

Docket No. 25-12031

Application of Sierra Pacific Power Company d/b/a NV Energy, filed under Advice Letter No. 689-E, to revise Tariff No. 1 to modify Generating Facility Interconnections Rule No. 15 pursuant to the Order issued in Docket No. 24-05041

Docket No. 25-12032

**REPLY COMMENTS OF THE VEHICLE-GRID INTEGRATION COUNCIL ON
PROPOSED RULE NO. 15**

Pursuant to the guidance provided in Procedural Order No. 1, issued February 13, 2026 by Commissioner and Presiding Officer Tammy Cordova, the Vehicle-Grid Integration Council (“VGIC”) respectfully submits reply comments on NV Energy’s Proposed Rule No. 15.

I. INTRODUCTION.

VGIC is a national 501(c)6 member-based advocacy group committed to advancing the role of vehicle-grid integration (“VGI”) through policy development, education, and research. VGIC aims to ensure the value from flexible EV charging and discharging is recognized and compensated to achieve a more reliable, affordable, and efficient electric grid. VGIC’s members include automotive original equipment manufacturers (“OEMs”), EV charging station manufacturers, EV charging site developers, distributed energy resource (“DER”) aggregators, EV charging station installers, operations, and maintenance providers, EV and charging station hardware suppliers, and publicly-owned electric utilities.

II. THE PROPOSED RULE SHOULD BE REVISED TO CORRECT ERRORS RELATED TO THE DEFINITION OF VEHICLE-TO-GRID (V2G) EV.

The Proposed Rule 15 would define “Vehicle-to-Grid (V2G) EV” on sheet 93M as:

“An EV that has the bidirectional transfer of electricity between it and the Utility’s Distribution System enabled through Certified bidirectional EVSE for V2G-AC, or an onboard inverter for V2G-DC, and that operates in Parallel Operation with the Utility’s Distribution System. V2G operation may include charging from the Utility’s Distribution System, discharging to serve all or a portion of onsite Host Load, and/or Exporting to the Utility’s Distribution System. For purposes of this Rule, a V2G EV (meaning that its V2G operational mode is enabled) is considered an ESD.”

This proposed definition is technically incorrect, as AC bidirectional charging systems convert power **onboard** the vehicle, whereas DC bidirectional charging systems use an inverter **offboard** the vehicle (e.g., in an EVSE or as a separate external wall box). Additionally, the definition implies that V2G operation may include “charging from the Utility’s Distribution System,” which is unclear, as EV charging is typically treated as load, not generation or energy storage. VGIC is unaware of any other utility or utilities commission that has included or proposed to include language in its definitions that deems EV charging “V2G operation,” including in California, Connecticut, Maryland, New Mexico, New York, and Texas. With these errors in mind, VGIC recommends the following alternative language be adopted:

“An EV that has enabled the bidirectional transfer of electricity between it and the Utility’s Distribution System ~~enabled~~ through Certified bidirectional EVSE for V2G-DC~~AC~~, or an onboard inverter for V2G-~~AC~~DC, and that operates in Parallel Operation with the Utility’s Distribution System. V2G operation may include ~~charging from the Utility’s Distribution System~~, discharging to serve all or a portion of onsite Host Load, and/or Exporting to the Utility’s Distribution System. For purposes of this Rule, a V2G EV (meaning that its V2G operational mode is enabled) is considered an ESD.”

III. ATTACHMENT 1 CONFIGURATIONS SHOULD BE CORRECTED TO APPROPRIATELY TREAT BREAK-BEFORE-MAKE BIDIRECTIONAL

CHARGING SYSTEMS AND REMAIN INTERNALLY CONSISTENT WITH OTHER BREAK-BEFORE-MAKE ENERGY STORAGE DEVICES.

Attachment 1 at PUC Sheet No. 93AZ(12) aims to detail various configurations and use cases. The guidance details that a break-before-make resource is not subject to Rule 15. This is consistent with VGIC's understanding of Rule 15 and Rule 19. However, at PUC Sheet No. 93AZ(14), the guidance states that bidirectional charging systems using the same break-before-make configuration are subject to Rule 15. The Proposed Rule 15 offers no explanation, nor is VGIC aware of any precedent in other states, for applying this treatment for bidirectional charging systems. Additionally, Proposed Rule 15 does not explain why this requirement is imposed on bidirectional charging systems but not on other resources, such as stationary Energy Storage Devices. Given the absence of a clear rationale for this requirement either in Attachment 1 or elsewhere in the Proposed Rule 15, VGIC respectfully urges that the Proposed Rule 15 be revised to clarify that these break-before-make bidirectional charging systems do not need to be subject to Rule 15. With this in mind, VGIC recommends the following alternative language:

Bidirectional EVSE or V2G EV configured for V2G operation, discharging will not occur while connected to the grid, but discharging will occur during Islanded Microgrid or backup mode following Break-before-Make	Yes, Interconnected and Parallel Operation but V2G EV acts solely as load when charging	No Export while grid-connected (discharging only in islanded Microgrid or backup mode)	No Yes	No Rule 15 Application required. Subject to Rule 19. Rule 15 Application.
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IV. CONCLUSION.

VGIC's appreciates the opportunity to submit these reply comments and looks forward to future collaboration with the Commission and parties in this proceeding.

Respectfully submitted,

/s/ Zach Woogen

Zach Woogen

Executive Director

VEHICLE-GRID INTEGRATION COUNCIL

Date: May 15, 2026

CERTIFICATE OF SERVICE

I hereby certify that I have on this date caused the above “**REPLY COMMENTS OF THE VEHICLE-GRID INTEGRATION COUNCIL ON PROPOSED RULE NO. 15**” to be served pursuant to the laws of the State of Nevada by electronic mail (e-mail) to all persons with a valid e-mail address on the below service list.

Executed May 15, 2026 at Sacramento, California

/s/ Zach Woogen

Zach Woogen

Executive Director

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