June 27, 2025

VIA ELECTRONIC FILING

Andrew S. Johnston, Executive Secretary
Maryland Public Service Commission
William Donald Schaefer Tower
6 St. Paul Street, 16th Floor
Baltimore, MD 21202

RE: Case No. 9741: Implementation Plan of the Potomac Edison Company for a Vehicle to Grid Electric School Bus Pilot

Enclosed for filing in the above-referenced matter please find the public comments of the Alliance for Transportation Electrification.

Respectfully,

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Director, Policy and Regulatory Affairs

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COMMENTS OF THE ALLIANCE FOR TRANSPORTATION ELECTRIFICATION

Introduction

The Alliance for Transportation Electrification (ATE) is pleased to submit the following comments supporting the proposed Implementation Plan of the Potomac Edison Company (PE) for a Vehicle to Grid Electric School Bus Pilot. ATE believes that PE's Implementation Plan meets the requirements set forth in Commission Order No. 91571 issued on March 21, 2025, as well as the legislative directive articulated in the Climate Solutions Now Act of 2022.

About ATE

ATE is a 501(c)(6) non-profit corporation established in early 2018 with the goal of promoting policies and regulatory measures to accelerate the pace of EV adoption and infrastructure. We primarily engage with policymakers at the State and local government level to remove barriers to EV adoption and to encourage the acceleration of EV infrastructure deployment with a particular emphasis on open standards and interoperability. We have over 60 members that include many electric utilities; automobile, truck and bus manufacturers; EV charging hardware and service providers; and related trade associations and non-profit organizations. We take a "big tent" approach to advance the industry and focus not just on accelerating EV charging deployments—which necessarily requires a strong utility role—but also promoting public accessibility and open standards. We are presently involved in about 30 proceedings in the States before public service commissions, Legislatures, state energy offices, state departments of transportation, and other agencies.

Background

Following Potomac Edison's January 17, 2024, submission of a five-year Electric School Bus Pilot Program proposal, on March 21, 2025, the Commission issued Order 91571 approving the pilot for up to 28 electric school buses (ESB) subject to certain requirements including that:

- Recipient school districts must include at least one Environmental Justice Community and one non-Environmental Justice Community;
- Potomac Edison consult with stakeholders to discuss additional information and evaluation metrics and submit a filing addressing those factors;
- Potomac Edison file a detailed Implementation Plan and revised budget; and
- Potomac Edison file a proposed ESB Pilot Program tariff.

PE complied with that timeline and directive in its proposal filed on June 20, 2025.

A Flexible Approach

The Implementation Plan submitted by PE marks a critical step forward in the electrification of school buses. The plan will foster a greater understanding of the benefits that electric school buses can bring to the distribution grid and the broader transition to cleaner transportation. As an early-stage deployment effort, PE's Implementation Plan offers a structured way to begin integrating electric school buses while gathering essential insights that will inform future programs and policies.

Because school bus electrification is still a relatively new use case, utilities and commissions should approach implementation with a degree of flexibility. While the environmental, health, and grid-related benefits are well understood in theory, the practical steps required to operationalize and scale this transition are still unfolding. Utilities, school systems, vendors, regulators, workforce partners, and communities are still in the early stages of understanding what works best in different settings. We don't yet know exactly how this transition will unfold across different communities, and it's important to remain open to learning and adjusting as we go.

Vehicle-Grid Integration

PE's Implementation Plan emphasizes not just Vehicle-to-Grid (V2G) capabilities, but also Vehicle-Grid Integration (VGI) more broadly, including V1G approaches like demand response in limited cases where V2G is not feasible and to foster wider geographic participation. At this early stage of development, and especially in the context of operations in the PJM market, it is important to assess a multitude of solutions during times when the distribution grid is stressed. The metrics Potomac Edison proposes, specifically signals issued by PJM, are a reasonable approach to piloting this new technology to obtain learnings and best practices to be deployed in the future to address specific constraints on the distribution grid.

These solutions allow utilities to communicate with host sites (such as school bus depots) and send pricing or load management signals, testing how quickly and robustly the ESBs respond. Potomac Edison's plan sets forth a framework to evaluate both technical integration and behavioral response, which are critical components of a successful long-term strategy. Also, we support the approach outlined in the plan for testing and evaluation. PE has sufficiently outlined the factors for both scheduled dispatch events and unscheduled dispatch events.

Education and Outreach

Just as important are the education and outreach efforts included in the plan. School systems and independent contractors in western Maryland especially need support to navigate these new technologies, build operational confidence, and make informed decisions. The partnerships between utilities, vendors, and school systems will be key to ensuring successful implementation and long-term scalability. Moreover, as PE states in its filing, it is vital to use these education and outreach efforts to provide actionable information to multiple school systems, contractors, and underserved communities. PE's approach to tailoring its efforts to the specifics of the Pilot and not to duplicate other generalized efforts is an efficient use of funds and should be approved.

Metrics and Evaluation

Finally, regarding the metrics and evaluation outlined in Part IV and Appendix A of the filing, we believe that PE has taken a proper approach in both efforts for data collection and the development of metrics. We know the parties and Commission spent a good deal of time discussing these during the hearing and in post-hearing meetings as directed by the Commission. The list of metrics in Appendix A is detailed and comprehensive. While we recognize that all the detailed data may not be immediately available as desired, we believe that PE has made a good-faith effort to scope and define these metrics and will work with the EV charging vendors and other stakeholders to generate a robust set of metrics for this initial pilot of 28 electric school buses.

Conclusion

Potomac Edison's proposed five-year Implementation Plan provides a valuable testing ground for how electric school buses can deliver benefits to students, communities, and the electric grid while helping all stakeholders learn together in real time. Recognizing the collective benefits outlined above, ATE finds that the proposed budget of $11 million is reasonable, and should be approved.