

DOCKETED

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Comments on the FresYes Block Grant for EV Charging

Additional submitted attachment is included below.

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Linda Urata
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October 3, 2017

California Energy Commission
Sent via Email

RE: Comments on the FresYes Block Grant for EV Charging

CEC Commissioners and Staff:

On behalf of the San Joaquin Valley Electric Vehicle Partnership (SJVEVP), I thank you for this opportunity to comment on the FresYes Block Grant for EV Charging. We applaud the CEC's decision to include funding for workplace and multi-family charging. We know this will have a significant impact in driving the market forward!

The SJVEVP supplied market data (with a little help from CCSE – thank you Kevin Wood!) that attracted investment into Fresno Metro from the Volkswagen Settlement. We have positive engagement with Electrify America. We will soon begin our collaboration in the rollout of their plan. We are excited to see a “double down” well-timed grant from the CEC to further scale the investments of Electrify America's \$1 Million infrastructure plan for Fresno Metro and as well, enhanced by the budget for public education and outreach of another \$3 Million.

An important aspect of Electrify America's plan includes the use of open network standards utilizing the latest version OCPP 1.6. PG&E's plan (and other utility companies) will specify OCPP. We agree with the decision to use an open standards network as it avoids a vendor lock-in. We believe this is the right way to build the infrastructure for Fresno County and the Greater Central Valley region.

OCPP 1.6 has a compliance tool that creates clarity on companies actually using the protocol and companies claiming to use it. In making a commitment to a charging network model, customers shopping for EV charging deserve transparency. And drivers deserve an easier and more cost-effective EV charging experience. Added confusion surrounding EV charging networks is not what is best for the market. Funding policies should specify OCPP 1.6 standards. We can support its adoption in California.

As a later developing market, we have an opportunity to build the Central Valley into a model EV market utilizing an open standards platform. OCPP 1.6 ensures vendor interoperability and customer choice. Open network standards create a fair marketplace, and one that will drive down the cost of hardware and network fees. These high costs are a major deterrent to installing EV charging and they drain public funds that could be further stretched to deploy more EV charging.

It is our observation of the emerging EV charging market, that newer market entrants are finding it difficult to compete with larger more established vendors. It has been the mission of our Partnership that as we develop this market, we do so in a way that is inclusionary of all charging vendors and creates a level playing field.

OCPP eliminates vendor lock-ins with proprietary network models, and promotes a competitive landscape for EV charging vendors and their customers. Even when grant funds are available to support most of the project costs, the recurring network fees remain a sore point for many existing or would-be charging hosts. The need for drivers to carry multiple charging accounts of proprietary network vendors is perceived as having a negative impact on growing the market.

We have an unprecedented opportunity to develop the Central Valley market with open standards. In a region that now has more EV and charging incentives than anywhere in the Nation, we are eager to see the impacts of combined investments from the San Joaquin Valley Air Pollution Control District, Electrify America, the CEC and PG&E. Fresno Metro would be an ideal opportunity to study the market impacts of open network standards.

We believe the only right decision is to develop a cohesive plan where the investments of each agency is compatible with and complimentary to the investments made by others. State funding should mirror other agency investments into OCPP qualified open standards that are created by the market.

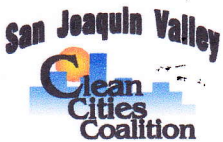
OCPP is the right solution for the Central Valley and for the State of California. Please support the policy development that puts us on this path.

Sincerely,



Bill Williams, Chair
San Joaquin Valley Electric Vehicle Partnership

CC: Mary Nichols, California Air Resources Board



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