

DOCKETED

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Project Title:	Block Grant for Electric Vehicle Charger Incentive Projects
TN #:	224046
Document Title:	Barry Sole Comments Consolidated Statements (OEMs, Service and Technology Providers)
Description:	Consolidated comments from Audi AG, Daimler AG, lo Techa, LUCID Motors, Oxygen Initiative, Porsche AG, and Volkswagen AG
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Consolidated Statements (OEMs, Service and Technology Providers)

Additional submitted attachment is included below.

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The following companies would like to submit these consolidated comments.

Companies:

Audi AG | Daimler AG | IoTecha | LUCID Motors

Oxygen Initiative | Porsche AG | Volkswagen AG

Consolidated Comments:

- We fully support the CEC's [CALeVIP](https://calevip.org/)¹ program and believe it will prove vital to accelerating the adoption of E-Mobility in California by creating incentives for the deployment of public charging infrastructures.
- We fully support the use of ISO/IEC15118 as a CALeVIP funding requirement for the EVSE-to-EV communication as it:
 - is internationally recognized and supported.
 - reduces costs by enabling manufacturers to develop and deploy the same technology in their products globally.
 - is secure, stable, and mature with high-profile interoperability testing symposiums taking place around the world regularly.
 - is continuously being further developed, improved and extended to ensure that it remains futureproof.
 - ensures interoperability between EVSEs and EVs from any manufacturer.
 - enables a high degree of user experience through functions such as Plug & Charge.
 - simplifies the user experience regardless of the charging type (AC, DC, and in the future inductive charging)
 - supports smart charging and “grid friendly” functions such as demand response.
 - supports streamlined ‘DER’ market certification of PEV batteries for aggregation and dispatch in ancillary services energy markets.

¹ CALeVIP - <https://calevip.org/>

- The aforementioned companies will gradually start phasing ISO/IEC15118 into their future products and/or services for both AC and DC charging.
- Some of these companies already have ISO/IEC15118 products and/or services available on the market today, while the remaining companies will bring their products to market within the next few years. For example, BEVs² with ISO/IEC15118 by 2020. Customers using these products and/or services will benefit from a comprehensive ISO/IEC15118 charging network.
- The products and/or services these companies (will) offer include, but are not limited to, PEVs³, public and/or private EVSEs, services built around ISO/IEC15118's capabilities, and the ISO/IEC15118 technology itself.
- For any charging infrastructure or network to be successful, it must be supported by the PEVs intended to utilize the network. It has already been publicly documented^{4,5,6} that many of the largest global OEMs intend to include ISO/IEC15118 in their vehicles for both AC and DC charging. This includes roughly 30 new BEV models and an estimated annual sales of 2 – 3 million vehicles by 2025 by the VW Group alone.

By identifying and supporting the deployment of a common and unique global standard today, the CEC will avoid stranding infrastructure investments which do not support the State of California's explicit goals detailed in Governor Brown's VGI Roadmap. We would like to thank the CEC for establishing the CALeVIP program, as well as allowing us the opportunity to submit these comments. We look forward to continuing to work together with the CEC and other Californian State agencies to help foster the adoption of E-Mobility. We are sure that the CALeVIP program will be a tremendous help in making this happen.

² Battery Electric Vehicles

³ Plug-in Electric Vehicles (includes BEVs and Plug-In Hybrids)

⁴ VW, Audi, Porsche, Daimler, BMW, Lucid Motors, Ford and Volvo comments to the CEC:
<https://efiling.energy.ca.gov/GetDocument.aspx?tn=215326>

⁵ VW, Audi, Porsche, Daimler, BMW, Lucid Motors and IoTecha comments to the CPUC:
<http://www.cpuc.ca.gov/WorkArea/DownloadAsset.aspx?id=6442457082>

⁶ VW Group comments to the CEC:
https://efiling.energy.ca.gov/URLRedirectPage.aspx?TN=TN214654_20161207T083603_VehicleGrid_Integration_Communications_Standards_Workshop__Volk.pdf