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*Comment Received From: Hannah Goldsmith
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**CaETC Comments on CALeVIP: Southern California Incentive Program
& Future Equipment Requirements Webinar**

Additional submitted attachment is included below.



July 3, 2017

California Energy Commission
Docket Office, MS-4
Docket No. 17-EVI-01
1516 Ninth Street
Sacramento, CA 95814
docket@energy.ca.gov

Submitted via online docket

Re: California Electric Vehicle Infrastructure Project: Southern California Incentive Program & Future Equipment Requirements Webinar

The California Electric Transportation Coalition (CalETC) appreciates the opportunity to provide feedback on the California Energy Commission's (CEC's) implementation plans for the Southern California Incentive Program (SCIP) as part of the new California Electric Vehicle Infrastructure Project (CALeVIP). CalETC also appreciates the opportunity to provide brief remarks on the CEC's CALeVIP Future Equipment Requirements Webinar held on June 28, 2018.

CalETC supports and advocates for the transition to a zero-emission transportation future as a means to spur economic growth, fuel diversity and energy independence, ensure clean air, and combat climate change. CalETC is a non-profit association committed to the successful introduction and large-scale deployment of all forms of electric transportation including plug-in electric vehicles of all weight classes, transit buses, port electrification, off-road electric vehicles and equipment, and rail. Our board of directors includes: Los Angeles Department of Water and Power, Pacific Gas and Electric, Sacramento Municipal Utility District, San Diego Gas and Electric, Southern California Edison, and the Southern California Public Power Authority. Our membership also includes major automakers, manufacturers of zero-emission trucks and buses, and other industry leaders supporting transportation electrification.

We support the efforts of the CEC to promote the adoption of zero-emission vehicles (ZEVs) and equipment. Although California is leading the nation in ZEV adoption, our state still has a long way to go to reach the goals in the new Governor's Executive Order B-48-18: 5 million ZEVs on California roads by 2030 and specified levels of zero-emission vehicle infrastructure by 2025 to support the transition to these vehicles. In addition, the state must implement SB 1275 (De León) [Chapter 530, Statutes of 2014] and SB 1204 (Lara) [Chapter 524, Statutes of 2014], which set targets for the deployment of 1 million zero- and near-zero-emission vehicles by 2023, access to

these vehicles by disadvantaged and low- and moderate-income communities, and deployment of zero- and near-zero-emission medium- and heavy-duty vehicle technologies. The CEC's California Electric Vehicle Infrastructure Project will help us reach these targets in an efficient and thoughtful manner and we appreciate the opportunity to provide the following feedback.

I. California Electric Vehicle Infrastructure Project: Southern California Incentive Program

CalETC echoes the comments made by the Southern California Public Power Authority (SCPPA), Adopt a Charger, and others regarding the inclusion of Level 2 charging infrastructure in the SCIP. **We recommend funding Level 2 charging infrastructure in addition to funding DC fast charging infrastructure.** Additional Level 2 charging infrastructure is needed in Southern California because DC fast chargers are not an option for many electric-vehicle (EV) drivers, such as those with plug-in hybrid EVs. DC fast chargers are a necessary component of the EV charging network, but for many years to come, Level 2 charging will be needed as much, if not more, than DC fast chargers in Southern California.

CalETC also echoes the comments of SCPPA regarding DC fast charger funding implementation and **recommend lowering the minimum number of DC fast chargers required at each potential site under the SCIP to one**, for the reasons articulated in SCPPA's letter.

II. California Electric Vehicle Infrastructure Project: Future Equipment Requirements Webinar

CalETC finds the CEC's approach to Energy Star certification appropriate and thanks staff for taking our feedback into consideration on this topic.

Regarding smart-charging equipment & network interoperability, the CEC's proposal is premature. Given the work completed and still in process on vehicle-grid integration communications and SB 454 (Corbett) [Chapter 418, Statutes of 2013], we believe it is too soon to determine which protocols and requirements should be mandated for future CEC charging-infrastructure investments.

CalETC opposes requiring ISO/IEC 15118, and recommends the CEC follow the lead of the Vehicle-Grid Integration Communication Protocol Working Group, which will result in a joint proposal from many agencies including the California Public Utilities Commission, California Air Resources Board, Governor's Office of Business and Economic Development, and the California Independent System Operator. The Working Group's final report will be released soon and will reflect a year-long

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process involving over 100 industry and other stakeholders and in-depth technical research. The issue of how electric vehicles will interact with the grid is more complex than purely vehicle-to-charging-equipment communication, and there are multiple standards and options to facilitate grid-integrated vehicle charging. In addition, there are competing business models among the charging station providers and many of the automakers that make it hard to determine the best path forward. Staff's presentation during the webinar depicted an unbalanced representation of the current landscape regarding, and stakeholder acceptance of, ISO/IEC 15118. **The CEC's proposal should be consistent with the Working Group's final report and recommendations.**

CalETC is actively engaged in the SB 454 process at the California Air Resources Board and also finds the CEC's recommendations regarding network interoperability premature. **We recommend the CEC wait until CARB's rulemaking process is complete before tying CARB's not-yet-adopted proposal to the CEC's investments.** We look forward to continuing to work with the CEC on appropriate future equipment requirements to support and accelerate the electric-vehicle market.

Thank you for your consideration of our comments. Please do not hesitate to contact me at (916) 551-1943 or hannah@caletc.com should you have any questions.

Sincerely,

A handwritten signature in blue ink that reads "Hannah Goldsmith". The signature is fluid and cursive, with the first name being more prominent.

Hannah Goldsmith, Project Manager
California Electric Transportation Coalition