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To: California Energy Commission, Docket Unit, MS-4

From: Larissa Koehler, Senior Attorney, Environmental Defense Fund

Re: Docket No. 2017-EVI-01

Environmental Defense Fund (EDF) would like to make the following recommendations in response to the November 18, 2019 workshop run by the California Energy Commission, entitled "Future Equipment Requirements for CALeVIP [the California Electric Vehicle Infrastructure Project].

EDF has been involved for many years in advancing transportation electrification in California, and ensuring that critical grid, consumer, and environmental benefits are brought to bear in an equitable way. In these comments, EDF focuses on the need for standardization that will better ensure interoperability of electric vehicle service equipment (EVSE) of all types.

It is clear that in order to achieve climate and clean air goals, there needs to be widespread and rapid electrification of vehicles across all sectors. Policies and programs being instituted by the California Air Resources Board and the California Public Utilities Commission aimed at ensuring more ambitious vehicle and infrastructure deployment, and more stringent emissions standards, are imperative. However, requirements being implemented and considered by the California Energy Commission to mandate technical standards for the CALeVIP program are also critically important, as these efforts create a more level playing field and avoids monopolistic behavior that could very well hamper needed growth.

The Open Charge Point Protocol (OCPP) provides more choice for customers, allowing for the ability to choose different hardware and software. As GreenLots states, "open networks enable interoperability, allowing the broadest set of products to work together…[which] in turn…promotes the expansion of existing infrastructure."[1] Further, "utilities that invest in smart meter infrastructure based on open standards are able to add smart grid applications for outage management, demand response, thermostat integration, street light integration and more."[2] Open standards will help to facilitate much needed widespread transportation electrification by allowing customers to choose different hardware and software providers instead of having to secure both components from one vendor. In this way, the owner of the charger can seamlessly switch network providers if a different company better meets their needs. This can potentially reduce the cost of charging stations and avoids the risk of stranded assets.. In addition, use of the OCPP can better enable integration of EVs into the grid in a way that allows the maximization of grid and potentially environmental benefits.

On the other hand, competing charging infrastructure based on proprietary standards raises societal cost and deprives customers of choice.The benefits from publicly funded charging infrastructure can only be realized if all charging station manufacturers and charging network providers are required to abide by minimum standards. To that end, EDF supports the Energy Commission's intention to update these standards in order to more clearly define what constitutes an "open standard protocol" and thus better harness the inherent benefits in a more broadly applicable communication standard. Moreover, that standard should be strictly enforced

[1] https://greenlots.com/wp-content/uploads/2018/09/Open-Standards-White-Paper.pdf

[2] Id.

– it is appropriate to remove companies that do not adhere to these standards from the CALeVIP list of eligible equipment.

EDF thanks the Energy Commission for its thoughtful approach to ensuring an effective and sustainable transition to vehicle electrification.