

**DOCKETED**

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*Comment Received From: Sara Rafalson*  
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**RE Docket Number 17-EVI-01; Staff Workshop on Future Equipment Requirements for CALeVIP**

*Additional submitted attachment is included below.*



January 2, 2020

California Energy Commission  
Docket Unit MS-4  
1516 Ninth Street  
Sacramento, CA 95814-5512

**RE: Docket Number: 17-EVI-01; Staff Workshop on Future Equipment Requirements for CALeVIP**

Commissioner Monahan,

EVgo commends the California Energy Commission (Energy Commission) for its leadership in helping the state meet its climate and zero emission vehicle (ZEV) goals and appreciates the Energy Commission's partnership as EVgo continues to develop a robust public fast charging network across California.

EVgo operates America's largest and most reliable public EV fast charging network, with more than 750 DC fast charging (DCFC) locations in 34 states and 66 metro markets nationwide. Today, more than 80% of California residents live within a 15-minute drive of an EVgo fast charger, and in 2019, EVgo saw 40% growth in its California fast charging network, which now includes over 300 stations – and growing – across the state.

EVgo looks forward to continued expansion through participation in Energy Commission programs like CALeVIP, which is critical for increasing the number of fast chargers to propel the state toward its goal of 10,000 fast chargers by 2025. As the Energy Commission looks to develop new technical requirements for future rounds of CALeVIP funding, EVgo thanks staff for hosting its workshop on November 18 and for soliciting stakeholder input. As a follow-up to the workshop, EVgo respectfully submits the following comments.

**1. EVgo supports technological innovation but notes that many of the proposed technical requirements are premature and warrant further stakeholder discussion.**

EVgo commends the Energy Commission for its interest in propelling technological innovation through the CALeVIP program. As the first American public charging network to announce 100% renewable energy<sup>1</sup>, as well as Autocharge<sup>2</sup>, EVgo strongly supports technologies that increase the efficiency and usability of EV chargers. However, EVgo worries that a hard deadline of 2021 for new standards such as EnergyStar and ISO 15118 are premature, and that specifying a specific transceiver chip may be inappropriate.

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<sup>1</sup><https://www.evgo.com/about/news/evgo-goes-100-renewable-to-power-the-nations-largest-public-ev-fast-charging-network/>

<sup>2</sup>EVgo is the first North American charging network to deploy Autocharge, which became available to Maven Gig drivers in 2019. Autocharge enables drivers to start a fast charging session in seconds, without an app or RFID/credit card.

As it relates to EnergyStar, EVgo was pleased to see the participation of the U.S. Environmental Protection Agency (EPA) during the November workshop. However, through our engagement at the federal level with the EnergyStar standard for DCFC, EVgo notes that a mandate of 2021 would be premature, and there are still many unknowns as to when the standard will be finalized. The first draft is expected in summer 2020, which will be followed by public comment period that could extend into 2021.

Given that this standard is still making its way through the regulatory process at the federal level, EVgo recommends that the Energy Commission wait until the next draft is released next summer and invite the U.S. EPA, as well as manufacturers and electric vehicle service providers (EVSPs), to discuss EnergyStar developments. The Energy Commission should use this future workshop to check-in on progress and assess feasibility for Energy Commission programs.

Finally, it should be noted that new standards aiming to lower standby and conversion losses should not come at the expense of optimal customer experience or hinder the rapid innovation of new DC fast charging architectures that hold much promise in reducing grid impact, reducing costs and increasing charging speeds. Therefore, more stakeholder discussion is warranted.

Similarly, while EVgo supports ISO 15118, we note that a 2021 mandate may be premature given the number of unknowns that still exist regarding implementation of this protocol. It is unclear as to which OEMs are implementing which features or versions of the protocol as well as how intricacies of the protocol will be handled by charging equipment manufacturers or EVSPs. Further, since most vehicles on the road today do not support ISO 15118, other means of authenticating drivers at charging stations must be implemented for years to come.

That said, EVgo is excited for the usefulness ISO 15118 can bring, and EVgo encourages the Energy Commission to hold further workshops on ISO 15118 and recommends including OEMs, charging station manufacturers, and EVSPs in the discussion.

Last, even if ISO 15118 does become mandatory in some future timeframe, EVgo does not recommend that the Energy Commission specify the transceiver chip. There are already only a few companies producing the appropriate transceivers, and choosing a winning model would create a monopoly that would hinder innovation and increase the cost of electric vehicle service equipment, which would not directly benefit anyone except the chosen chip maker.

## **2. The Energy Commission should balance new technological innovations with CALeVIP's goals to deploy chargers at scale to fulfill gaps in charging infrastructure.**

EVgo commends the Energy Commission for its success in developing CALeVIP, which has had success in accelerating charging deployments through its simplicity in program design. According to the latest Clean Transportation Program Investment Plan, California is expected to have a shortfall of 3,600 fast chargers, and EVgo is pleased to see the Energy Commission leading the charge on addressing this shortfall.

As the Energy Commission creates new, more stringent technical requirements, especially for the standards it is looking to drive ahead of their commercialization timelines, EVgo asks that staff balance its interest in driving technical innovation with its goals of deploying chargers at scale.

One of the benefits of CALeVIP has been the simplicity in requirements, which has allowed new vendors to join the list with ease. As an electric vehicle service provider, EVgo already notes that there are already a limited number of reliable manufacturers for charging equipment, especially in the high power category. EVgo worries that more complexity may limit vendor choice for both customers and network providers, thereby narrowing the list of eligible vendors to only a few select companies. This could unduly slow charging deployments while also increasing costs.

As such, EVgo encourages the Energy Commission to work closely with charging manufacturers, automakers, and network providers alike, as well as other state and federal agencies, to better understand technological innovations that are coming to market over the next several years. EVgo has great respect for the role that the Energy Commission has played in sectors such as energy appliance efficiency, lighting efficiency and equipment standards. We look forward to participating in stakeholder processes to drive EVSE improvements through the R&D, product development, and manufacturing cycles with a wide range of relevant stakeholders.

### **3. EVgo thanks the Energy Commission for coordinating with other state agencies.**

EVgo was active in rulemakings with both the Division of Measurement Standards and the California Air Resources Board over the last several years, which created new standards for DCFC in 2023 and 2022, respectively. EVgo has appreciated the Energy Commission's attention to both of these developments, which underwent several rounds of stakeholder feedback. As such, EVgo encourages Energy Commission to align its requirements with these already established deadlines for compliance.

## **Conclusion**

EVgo thanks the Energy Commission for its leadership role in accelerating charging infrastructure investments throughout California, and for its forward-looking approach to technological innovation. EVgo looks forward to participating in future workshops to discuss developments in the charging infrastructure space. Please do not hesitate to contact us if EVgo can answer any additional questions or be of further assistance.

Sincerely,

Sara Rafalson  
Director, Market Development  
[sara.rafalson@evgo.com](mailto:sara.rafalson@evgo.com)