

DOCKETED

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CaETC Additional Comments Docket No 17-EVI-01 Future Equipment Requirements for CALeVIP

Additional submitted attachment is included below.

January 10, 2020

California Energy Commission
Docket Unit, MS-4
Re: Docket No. 17-EVI-01
1516 Ninth Street
Sacramento, CA 95814

Re: Docket No. 17-EVI-01: Future Equipment Requirements for CALeVIP

Dear Commissioners:

The California Electric Transportation Coalition (CalEVC) and the co-signatories listed below appreciate the opportunity to provide feedback on the California Energy Commission's (CEC's) plans for the California Electric Vehicle Infrastructure Project (CALeVIP). This letter is a complement to our letter submitted on December 9, 2019 by adding two additional co-signatories. We also appreciate the opportunity to provide comments on the CEC's workshop on Future Equipment Technology Requirements for CALeVIP, held on November 18, 2019. We strongly support the efforts of the CEC to promote the adoption of zero-emission vehicles (ZEVs) and equipment. In order to drive adoption of plug-in electric vehicles and meet California's electric vehicle targets, we need to drastically increase the amount of publicly accessible, easy-to-use charging stations. The CEC's CALeVIP Block Grant for Electric Vehicle Charger Incentive Projects will help us reach these targets in an efficient and thoughtful manner.

We oppose mandating ISO/IEC 15118 as a requirement in CALeVIP grants. We acknowledge ISO/IEC 15118 as one potentially promising communication pathway, specifically between the plug-in electric vehicle (PEV) and electric vehicle service equipment (EVSE). However, the Interagency Vehicle Grid Integration (VGI) Communication Protocol Working Group (Phase 1) found that the issue of how electric vehicles interact with the grid is more complex than purely PEV-EVSE communication, and there are multiple standards and options to facilitate grid-integrated vehicle charging, with no clear consensus to date among industry stakeholders on the best option. To ensure policy alignment across state agencies, the CEC's proposal should be consistent with the Interagency Working Group's final report and recommendations, which did not recommend any specific communication protocol for AC conductive charging.¹

In addition, there are competing business models among the charging station providers and many of the automakers, which makes it hard to determine the best path forward. Absent clear industry consensus and sufficient market data and experience, the CEC should not mandate a specific communication pathway in order to avoid the risk of "picking winners and losers."

Because the communication protocols for DC fast or slow charging or wireless AC charging were not analyzed in the Interagency Working Group (Phase 1) or similar forums open to industry feedback,

¹Available at <https://www.cpuc.ca.gov/vgi/> Final report at pages 21- 25. See Table 4 for details on recommended hardware futureproofing. Staff recommended in Table 5 a list of several communication protocols that could be used but recommends not requiring a specific communication protocol at this time.

CaLETc believes it is premature for the CEC to adopt ISO/IEC 15118 for these use cases as proposed at the November workshop. CaLETc recommends that, prior to any CALeVIP communication protocol requirements on DC or wireless charging, an in-depth analysis with stakeholders and agencies be conducted, similar to the process conducted by the Interagency VGI Communication Protocol Working Group (Phase 1).

Finally, to ensure policy alignment, we recommend the CEC incorporate CARB's EVSE payment and access requirements for AC and DC charging stations by not requiring another payment method on top of CARB's requirements. CARB conducted a two-year, public rulemaking process on options for payment and access to publicly available AC (level 2) and DC charging stations per [Senate Bill 454 \(Corbett\)](#) [Chapter 418, Statutes of 2013]. CARB's adopted regulation² requires three payment methods, and OCPI, but declined to require ISO/IEC 15118 for many reasons.

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 kristian@caletc.com should you have any questions.

Sincerely,



Kristian C. Corby, Deputy Executive Director
California Electric Transportation Coalition

Co-Signatories:

BMW	Toyota
FCA Group (Fiat Chrysler Automobiles)	Kitu Systems, Inc.
Ford Motor Company	
General Motors	
Los Angeles Department of Water & Power	
Pacific Gas & Electric Company	
San Diego Gas & Electric Company	
Southern California Edison	
Tesla	

²Available at <https://ww2.arb.ca.gov/rulemaking/2019/evse2019> CARB's Board voted to approve the regulation and it will soon go to Office of Administrative Law.