

**DOCKETED**

<b>Docket Number:</b>	19-TRAN-02
<b>Project Title:</b>	Medium- and Heavy-Duty Zero-Emission Vehicles and Infrastructure
<b>TN #:</b>	233080
<b>Document Title:</b>	UL LLC Comments - On Vigil Workshop
<b>Description:</b>	N/A
<b>Filer:</b>	System
<b>Organization:</b>	UL LLC
<b>Submitter Role:</b>	Public
<b>Submission Date:</b>	5/22/2020 8:50:42 AM
<b>Docketed Date:</b>	5/22/2020

*Comment Received From: UL LLC  
Submitted On: 5/22/2020  
Docket Number: 19-TRAN-02*

## **On Vigil Workshop**

*Additional submitted attachment is included below.*

## ViGIL Workshop Comments from UL

Submitted May 21, 2020

- 1) It would be preferable if the award remains for one awardee. If the award is split to multiple awardees, it won't be sufficient to achieve the goal of the grant. It will take more than \$2 million to implement the requested modifications, therefore, dividing the funds would create an unsubstantial investment. Multiple disciplines may be needed to achieve the goals, but it should all be done in one submission.
- 2) A 50% cost share request is fair considering the additional EV charging work that can be gained by the awardee.
- 3) Please provide clarification on expectations for funding dates. In today's uncertain financial climate, it would be prudent to allow applicants to have ample time to make any investment commitments.
- 4) Our experience has shown it is difficult to use a manufacturer owned laboratory as a witness testing facility for their competitor's product, even with confidentiality agreements in place. Please keep this in mind if you decide to allow EV charging OEMs to apply for the grant.
- 5) NRTL certifications to the UL safety requirements should be considered in the mandatory standards for this GFO. These include UL 2202, UL 2594, UL 2231-1, UL 2231-2, UL 2251, UL 9741 and UL 1741.
- 6) UL 9741 should be included in the mandatory standards list. UL has already certified a product to this published UL document and it is available for future certifications. [See press release here](#). EV chargers that are grid-interactive will need to comply with UL 9741 as it references UL 1741 for grid connection.
- 7) Slide 16 of the presentation defined proposed funding guidelines. The definition of capacity expansion should include expansion of the power capacity of the existing laboratory facility.
- 8) In order to ensure project completion times remain in line with OEM expectations, it is recommended that the applicants be restricted to private entities. If an applicant is a Nationally Recognized Testing Laboratory, then product certifications will be more accepted since they are in compliance with ISO 17025 and ISO 17065.
- 9) Please clarify the proposed eligibility requirements. Does the existing facility need to already have EV charging testing capability? If so, how will the proven capacity for EV charging testing be evaluated?