

DOCKETED

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Vehicle-Grid Innovation Lab (ViGIL)

Additional submitted attachment is included below.



May 26, 2020

Matt Alexander
California Energy Commission
1516 Ninth Street
Sacramento, CA 95814

Re: Vehicle-Grid Innovation Lab (ViGIL)

Dear Mr. Alexander,

EVBox welcomes the opportunity to provide comments to the California Energy Commission's (CEC) workshop and draft concept proposal on the issuance of a competitive grant for the establishment of ViGIL, a facility lab to support testing various technologies. EVBox is headquartered in Netherlands and is a manufacturer of EV charging equipment and related cloud-based services with an installed base of over 115,000 level 2 and DC fast chargers in 57 countries. EVBox is actively deploying charging stations all over North America.

Earlier this year, EVBox opened its official state-of-the-art Lab Space in Amsterdam to test all of its future charging stations on actual vehicles in its own facility.¹ Therefore, we understand and appreciate the intent and need for ViGIL. ViGIL is expected to provide local testing capacity for charging technologies including- ISO 15118, Open Charge Point Protocol (OCPP), Section 3.40 of the NIST 2020 Handbook 44, Open Automated Demand Response 2.0b, and ENERGY STAR. We commend the CEC for being forward looking with the lens of future-proofing Electric Vehicle (EV) charging infrastructure. We also expect that the lab will be used to test widely available commercially available technology and rely on current tests that have already been developed. This grant should not be used as an opportunity to relitigate and revisit existing testing procedures. In general, we support the establishment of the ViGIL with the following proposed modifications

1. Limit eligible applicants to established independent labs

The competitive grant is open to California private entities for capacity expansion at an existing facility located within California. Current eligibility for applicants who can apply for the grant include, "all corporations, limited liability companies (LLCs), limited partnerships (LPs) and limited liability partnerships (LLPs) that conduct intrastate business in California."

The proposed eligibility requirements are broad and can lead to perverse consequences unless they are defined more narrowly. Like EVBox, other manufacturers may have their own testing facilities and it would be inappropriate for manufacturers and other interested entities to test equipment of competitors. Electric Vehicle Supply Equipment (EVSE) manufacturers

¹ <https://news.evbox.com/en-WW/184951-evbox-opens-own-lab-space-facilities-to-improve-in-house-testing-on-all-its-charging-stations>



should feel safe in sending their equipment to the ViGIL without worrying about intellectual property violations and inappropriate use of competitive information.

Therefore, eligible applicants for the ViGIL should be limited to independent testing labs with a track record of performing similar tests. In no way should the selected independent lab have an affiliation or have a partnership with EVSE manufacturers, software providers, and EVSE component manufacturers. We also recommend that the grant not eliminate new construction but allow established independent national and international labs the opportunity to set up business in California.

2. Open Charge Point Protocol (OCPP) should not be included in the testing requirements because OCPP testing and certification are already in place

Including OCPP in the eligible testing technologies is redundant and undermines the efforts and testing protocols developed by the industry to date. The Open Charge Alliance (OCA), a nonprofit foundation with 125 members from 29 countries has handled the specification development, certification program development and testing tool development for OCPP for over a decade. The certification program² is a joint effort of the OCA and several independent test laboratories around the world to test conformance to the OCPP specification. OCPP testing and certification can be performed by the independent testing lab DEKRA in Virginia.³ Since DEKRA is already testing for OCPP based on a testing tool developed by OCA and also has a certification pathway post-testing; it seems redundant to spend California state funds on developing a new OCPP testing tool kit.

3. Include California Type Evaluation Program (CTEP) testing specified in Title 4. Business Regulation

CEC proposes to test the requirements outlined in Section 3.40 of the NIST 2020 Handbook 44 at ViGIL. For EVSEs used for commercial purposes, California adopted the device requirements published in the current Section 3.4 of the NIST Handbook 44 along with a set of additional requirements only enforceable in California. All commercial EVSEs in California must be evaluated, tested and approved by the Department of Food and Agriculture and receive a certificate of approval from the CTEP.⁴ We recommend that ViGIL testing include these additional requirements which start as early as January 1, 2021.⁵ Testing for these California specific requirements will help manufacturers save a lot of time and money.

4. Introduce timelines for testing

EVSE manufacturers constantly struggle with prolonged timelines of independent laboratories for testing and certifying equipment to current standards. These delays have resulted in product delays and considerable frustration and expenses for manufacturers. We recommend that CEC make the grant contingent on testing laboratories performing the labs

² <https://www.openchargealliance.org/certification/ocpp-16-certification/>

³ <https://www.openchargealliance.org/certification/testing-laboratories/>

⁴ <https://www.cdfa.ca.gov/dms/pdfs/regulations/EVSE-FinalText.pdf>

⁵ <https://www.cdfa.ca.gov/dms/programs/zevfuels/>



within stipulated time periods and schedules. We also propose that CEC ask bidders to include proposed fee per test before deciding on a winner.

Sincerely,

Megha Lakhchaura

Director, Policy and Utility Programs
EVBox, North America
megha.lakhchaura@evbox.com