

**DOCKETED**

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*Comment Received From: Enel X North America, Inc.  
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**Enel X Comments on ViGIL**

*Additional submitted attachment is included below.*



May 27, 2020

California Energy Commission  
Docket Unit MS-4  
Re: Docket No. 19-TRAN-02  
1516 9th Street  
Sacramento, CA 95815

**Re: CALeVIP Future Equipment Requirements (Docket 19-TRAN-02)**

Dear Commissioner Monahan and Staff:

Enel X North America, Inc. (Enel X) appreciates the opportunity to comment on the California Energy Commission's (CEC) draft solicitation concept for the Vehicle-Grid Innovation Lab (ViGIL), as presented at the May 13, 2020 Staff workshop.

Enel X supports the CEC's proposal to award \$3 million to fund the development of in-state capabilities to test EV charging technologies for compliance with various protocols and standards. As proposed, the awardee would be required to test for ISO/IEC 15118, Open Charge Point Protocol (OCPP), and NIST Handbook (HB) 44 Section 3.40, with options to test for Open Automated Demand Response 2.0b and ENERGY STAR for EV supply equipment.

We agree that the proposal should reduce the cost, time, and resources needed for testing of charging equipment and help create a robust, diverse market in California. Similarly, we believe that such standards promote the objectives of convenience, cost control, customer choice, and interoperability – all critical pillars of the state's EV infrastructure investments.

In finalizing the requirements for the ViGIL solicitation, Enel X recommends that CEC staff look to focus testing requirements on existing gaps in the marketplace and to coordinate with other standards bodies and associated entities, as to not "reinvent the wheel." One example of this is needed coordination with the California Division of Measurement Standards, who oversee the California Type Evaluation Program to deem compliance with NIST HB 44 Section 3.40.<sup>1</sup>

As stated in our comments on potential future eligibility requirements for EV infrastructure investments through the CALeVIP program,<sup>2</sup> more conversations are needed to determine the exact use cases and levels of certification that might be required for some combination of these standards in order to be eligible for EV infrastructure funding. That said, we believe that the ViGIL can provide a necessary bridge to enable the goals of those conversations.

Enel X thanks the CEC for considering these comments and looks forward to continuing collaboration with the agency and other industry stakeholders to push innovation in the EV charging space.

Sincerely,

**/s/ Marc Monbouquette**

Marc Monbouquette  
Regulatory Affairs Manager  
Enel X e-Mobility

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<sup>1</sup> <https://www.cdfa.ca.gov/dms/programs/ctep/ctep.html>

<sup>2</sup> Enel X Comments on CALeVIP Future Equipment Requirements (Docket 17-EVI-01), December 13, 2019