

**DOCKETED**

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## **Interoperability Testing Events RFP Concept**

*Additional submitted attachment is included below.*

February 8, 2021

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

**RE: EVgo Comments on CEC Draft Concept for Interoperability Testing Events Solicitation**

Dear Mr. Alexander,

EVgo thanks the California Energy Commission (CEC) for its continued leadership in transportation electrification and for the opportunity on the Energy Commission's (CEC) draft concept for interoperability testing events.

EVgo is the nation's largest public fast charging network for electric vehicles, and the first to be powered by 100% renewable energy. With more than 800 fast charging locations in more than 600 cities across 34 states, EVgo owns and operates the most public fast charging locations in the U.S. and serves more than 220,000 customers. Today, more than 115 million Americans live within a 15-minute drive of an EVgo chargers. As a charging technology first mover, EVgo works closely with business and government leaders to accelerate the ubiquitous adoption of EVs by providing a reliable and convenient charging experience close to where drivers live, work and play, whether for a daily commute or a commercial fleet.

EVgo supports the goals and methodology of the solicitation as hardware and software interoperability testing can be a costly, complex process for electric vehicle charging station providers (EVSPs) that requires coordination between charging equipment manufacturers, network providers, and vehicle manufacturers. The CEC's efforts will benefit these stakeholders and ultimately consumers as the testing events will reduce costs and streamline the accessibility of interoperability testing.

We offer the following brief recommendations for the CEC's consideration:

- 1. Testing events should be in both Southern and Northern California, and multiple events are strongly desired.**

EVgo makes note of the questions posed by CEC staff at the workshop in regards to testing event logistic and appreciates Staff's consideration of these dynamics. Firstly, it is important to increase accessibility to these events by co-locating the events at locations in both Northern and Southern California. Transporting medium and heavy-duty vehicles, as well as electric vehicle supply equipment (EVSE), can prove quite costly in the prototype phases. By having multiple locations, EVSPs can make use of nearer locations to decrease barriers to testing events.

EVgo also recommends holding multiple interoperability testing events. While testing is crucial to ensure that equipment is functioning, workshopping issues that are identified during the testing event can often take some time to solve, and then retesting is required to ensure the fixes are successful. Having near term testing event dates can ensure that these teams are able to test out and solve these issues expeditiously.

**2. Limit the scope of the testing events to interoperability only in order to optimize value.**

While EVgo appreciates the CEC's consideration of including many different activities within the event, in the interests of optimizing funding and limiting COVID-19 spread, the events should be limited to the interoperability testing only. Such testing should focus on the station to vehicle protocols such as DIN 70121 and ISO 15118. By narrowing the scope of the of the events to interoperability, the CEC would serve a critical function in easing the testing process for an array of stakeholders needed for successful testing and implementation.

Ultimately, the concept of the interoperability testing events would help provide streamlined opportunities for stakeholder communication, product development, and standards implementation. EVgo strongly supports the presented concept and looks forward to the continued development of these events. Thank you for the consideration of these comments, and do not hesitate to contact us if you have any questions or if the EVgo team can be of resource.

Best,



Jeremy Whaling, EVgo  
Engineer, EV Systems



Adam Mohabbat, EVgo  
Manager, Market Development