

DOCKETED

Docket Number:	19-AB-2127
Project Title:	Implementation of AB 2127 Electric Vehicle Charging Infrastructure Assessments
TN #:	236938
Document Title:	Barton Sidles Comments - CEC Comment AB2127
Description:	N/A
Filer:	System
Organization:	Barton Sidles
Submitter Role:	Public
Submission Date:	2/26/2021 5:13:41 PM
Docketed Date:	2/26/2021

*Comment Received From: Barton Sidles
Submitted On: 2/26/2021
Docket Number: 19-AB-2127*

CEC Comment AB2127

See attached comment submitted from Barton Sidles

Additional submitted attachment is included below.



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February 26, 2021

State of California
California Energy Commission
docket@energy.ca.gov

Re: **Comments on the “Implementation of AB 2127 Electric Vehicle Charging Infrastructure Assessment” – Staff Report (Docket Number 19-AB-2127)**

Dear Sir or Madam:

Hubject and IoTecha appreciate the opportunity to provide input on the Assembly Bill (AB) 2127, **Electric Vehicle Charging Infrastructure Assessment** – staff report, released in January 2021.

We commend the State of California and the California Energy Commission for their dedication to increase electric vehicle (EV) adoption.

During the recent CEC workshop on CEC staff’s AB 2127 charging infrastructure needs assessment for 2030, we heard a number of comments that could be somewhat misleading. We would like to clarify the reality of the market and the direction adopted by the industry.

We applaud CEC for highlighting in [Chapter 5](#) of the assessment the need to prioritize charging using common connector and communication standards (CCS with ISO 15118 to enable its varied use cases). Global interoperability creates economy of scale and healthy competition – a healthy platform for reducing complexity/costs and improvement of user experience.

It is clear that global automakers firmly embrace CCS with ISO/IEC 15118 as a global standard. Recent announcements made by Electrify America with Lucid Motors, Porsche, and Ford are a great example of that.

The core technology used for AC and DC charging and valuable applications such as Plug and Charge, V1G, V2G, V2L is already in many vehicles and chargers today.

Any implementation that requires additional protocols will create additional delays, uncertainties, interoperability issues, and potentially additional costs.

Additionally, the cost of using Plug and Charge is less expensive than using conventional credit cards. Please see: <https://www.afirev.fr/en/recommendation-by-afirev-following-an-analysis-of-the-utilities-and-costs-of-iso-15118-communication-protocol-between-electric-vehicle-and-charging-point/>

Hsubject and IoTecha once again applauds the CEC for recognizing the value of standardization and the proposal to encourage deployment of the ISO/IEC 15118 capable chargers. As numbers of EVs and chargers grow there will be a greater need for Smart Charging and Grid Integration, key features enabled by CCS with ISO/IEC 15118. The upcoming ISO/IEC 15118-20 release enables V2G functionality that is vital to solving energy crisis and is well positioned to improve grid resiliency.

We appreciate the time and effort the CEC staff took to organize the workshops and prepare this AB 2127 Infrastructure Needs Assessment Draft Report.

Please contact us if you have any questions.

Sincerely,

Barton Sidles
Sr. Director Corporate and Business Development
Hsubject Inc.

Oleg Logvinov
CEO
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