DOCKETED	
Docket Number:	19-AB-2127
Project Title:	Implementation of AB 2127 Electric Vehicle Charging Infrastructure Assessments
TN #:	237042
Document Title:	Electric Vehicle Charging Association Comments - EVCA AB 2127 Report Comments
Description:	N/A
Filer:	System
Organization:	Electric Vehicle Charging Association
Submitter Role:	Public
Submission Date:	3/8/2021 4:19:16 PM
Docketed Date:	3/8/2021

Comment Received From: Electric Vehicle Charging Association
Submitted On: 3/8/2021
Docket Number: 19-AB-2127

EVCA AB 2127 Report Comments

Additional submitted attachment is included below.

Electric Vehicle Charging Association
INNOVATION FOR CLEAN MOBILITY

March 8, 2021

California Energy Commission
1516 Ninth Street
Sacramento, CA 95814

Docket: 19-AB2127

RE: EVCA Comments on the AB 2127 Electric Vehicle Charging Assessment

Thank you for the opportunity to comment on the Energy Commission's (CEC) draft AB 2127 Electric Vehicle Charging Assessment. The Electric Vehicle Charging Association (EVCA) is a not-for-profit trade organization of twelve leading electric vehicle (EV) charging industry member-companies and one zero-emission autonomous fleet operator. EVCA's mission is to advance the goal of a clean transportation system in which the market forces of innovation, competition, and consumer choice drive the expeditious and efficient adoption of EVs and deployment of EV charging infrastructure.

Below EVCA offers the following comments for consideration:

1. **We support the CEC's inclusivity toward a multitude of charging company business models.**

EVCA was founded on the principles of innovation, competition, and customer choice. We believe that promoting innovation in the charging market, by allowing a multitude of business models to participate in the CEC's programs, will further drive private investment in the industry and encourage the development of solutions that enhance the customer charging experience. EVCA represents a wide swath of companies across the EV ecosystem with varying business models – software developers, hardware manufacturers, owner/operators, off-grid or mobile charging solutions, network operators, and more. We respectfully encourage the CEC to further include eligibility for a plethora of business models to participate in its programs as reflected above.

Another opportunity for promoting new and innovative business models includes working with state and local officials to identify strategic opportunities to deploy charging solutions to ensure charging is resilient to events that shut down the grid or exempt from public safety power shut-offs so that drivers are not stranded in times of emergencies.

Furthermore, there are a number of new transportation solutions that have emerged in recent years, such as transportation network companies (TNCs), EV fleets, and vehicle sharing, that when electrified could be valuable for California's ambitious climate targets. TNCs in particular

are comprising an increasingly larger share of vehicle emissions as consumers increasingly rely on them. Incentivizing infrastructure solutions to support their electrification still helps solve broader market needs, especially because these charging technologies will support broader economies of scale. However, these models remain largely ineligible for CEC program funding, due to constraints on charger ownership and public access as a function of fleet operations.

Adjusting eligibility to include high-mileage use cases like TNCs and charter-party carriers (TCPs) could complement existing successful EV programs, rapidly decarbonize transportation, and ensure that Californians without access to an EV can still benefit from sustainable, zero-emission miles. While certain proposals in this workshop such as TNC DCFCs at airports and e-mobility hubs may have limited impact in the near-term, they hold significant promise for future emissions reduction. The CEC's efforts to accommodate these innovative models in this workshop is a strong initial step forward. We encourage the CEC to expand eligibility in all future programs under consideration, and may even provide the CEC with valuable learnings on cost effective infrastructure solutions that could inform future program design.

2. **In addition to the improvement of existing programs, we encourage the CEC to provide more technical assistance to help companies better understand the reverse auction mechanism and cost of enabled charging equation.**

EVCA supports the CEC's exploration of new funding mechanisms to further leverage private investment in charging infrastructure that would augment, not replace, existing CEC funding programs and mechanisms. Public funding, at this stage in the market, is critical to accelerating is necessary the scale of infrastructure needed to meet the state's ZEV and ZEV infrastructure deployment goals, and reforms to existing programs like CALeVIP to enable shovel ready projects will help meet the demand of 1.5 million chargers needed by 2030. EVCA further supports funding mechanisms that promote technological and business model innovation in the market as this can further promote competition and increase cost competitiveness. These values best serve drivers in the end as it will ensure the private market is offering cost competitive solutions that enhance the customer's charging experience, which in turn will further promote EV adoption.

EVCA also agrees that these mechanisms should not be predicated on a specific business model or form of infrastructure; rather, funding mechanisms should promote maximizing the amount of charging at the lowest cost possible.

Given the complexities of some of the proposed funding mechanisms, EVCA also respectfully encourages the CEC to hold more in-depth technical workshops that further explain the parameters of these mechanisms, showcase examples of how they could work, and provide additional technical support to charging companies to ensure they understand how to participate in such funding mechanisms.

3. **We encourage the CEC to increase industry information sharing about the implementation of ISO 15118, including working closely with CharIN.**

EVCA thanks the CEC for listening to past feedback and being flexible about timelines for implementation on the standard. EVCA recognizes the potential benefits of ISO 15118 – industry innovations that simplify the charging experience for the customer will reinforce EVs as

convenient and accessible. A large share of OEMs have announced their commitment to implementing ISO 15118 or have already begun to do so. However, significant questions remain as to the status of its implementation across the entire EV ecosystem. There isn't industry-wide agreement or a shared understanding of which version of ISO 15118 will be used, whether parts or all of it will be implemented, and on what timeline. Ultimately, implementation of ISO 15118 cannot be accomplished by charging providers alone. OEMs will have a key role in finalizing and implementing this protocol, and yet the status and timeline for its incorporation is extremely unclear. If charging providers are to successfully incorporate ISO 15118 into their EVSE product lines, they need significantly more information on the aforementioned issues. Charging providers will also need a reasonable amount of time to incorporate new protocols and standards into their product roadmap – after implementation pathways become clear. We encourage further conversations with the CEC, equipment manufacturers, OEMs, and EVSPs on this topic, and for the CEC to continue to support the industry as it prepares for implementation of this standard. Increased financial support for testing may also be needed.

Thank you for your consideration,

[electronically submitted]

Adam Mohabbat
Chair
Electric Vehicle Charging Association