

DOCKETED

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MBAG Comments on the CEC's Final Interoperability Testing Events RFP

Additional submitted attachment is included below.



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Research & Development
North America, Inc.
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April 13, 2021

California Energy Commission
1516 Ninth Street
Sacramento, CA 95814

Docket: 19-AB 2127

RE: MBAG Comments on the CEC's Final Interoperability Testing Events RFP

Mercedes-Benz USA, LLC ("MBUSA") and Mercedes-Benz Research & Development North America, Inc. ("MBRDNA"), on behalf of our parent company Mercedes-Benz AG ("MBAG"), would like to thank the California Energy Commission ("CEC") for the opportunity to provide comments on Electric Vehicle Charging Infrastructure Assessment ("AB 2127"). We fully support, and would like to participate in, robust Interoperability Testing Events so that we can test our products before they are in the market. Our comments below respond to specific questions posed by the CEC on how to make these events more successful.

We are pleased that the CEC is planning to organize RFP Interoperability Testing Events. Some factors that would help encourage our participation include:

- **Participants:** We believe a high participation rate is essential for these events to be successful. A minimum of three EVSE manufacturers would be required to allow for at least one day of testing and to make participation beneficial. We are already in close contact with several key organizations like ELAM/CP and ABB/BTC Power. We would derive even more value from the events if manufacturers/distributors of new products such as charging stations and wall boxes also were to participate.





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- **Frequency:** The frequency of the events should depend on changes and upgrades on the infrastructure side, such as installation of plug and charge, revisions to tariff tables, and the implementation of new charging standards. We believe it would be most beneficial to test equipment before it is installed in the field, so that we can anticipate problems that may arise once that equipment is in use. While it appears the CEC is considering three events per year, we believe that an event every six months (i.e., two events per year) would be sufficient to meet our needs.
- **Cost Implications and Location:** MBRDNA's testing facilities are located in Long Beach. Therefore, the most convenient location for us for an Interoperability Testing Event would be in Southern California, and preferably, the Los Angeles area. If events are held near LA, we would be able to participate without the need for any additional financial support. For events held further away, our participation will be more limited due to cost and time constraints. Therefore, if the CEC is planning to hold frequent events, we would request that cost be kept to a minimum.
- **Test Objective:**
 - From a vehicle standpoint, testing the communication between EV-EVSE is sufficient during such a test event. Testing in the field is inevitable to ensure proper interoperability functionality.
 - For the end customer, only real world experience counts. Lab testing will never be able to completely cover real world behavior (due to non-productive QA environments and no real backend connection to our services).
 - We offer this best practice from CharIN Festival Arnheim: three days EV-EVSE testing, with an additional two days of optional backend testing for EVSEs and Backends.
- **Need for the exchange of security certificates:** To allow a full featured testing of PnC and future ISO15118-20 testing, the creation of a testing PKI and the exchange of security certificates between the testing partners is required.

To summarize, we support the CEC's plans to develop an RFP for Interoperability Testing Events and appreciate the opportunity to provide insights to help ensure their success. We plan to share some information on use cases for ISO 15118 in the near future.





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Thank you for considering our comments.

Sincerely,

MERCEDES-BENZ RESEARCH & DEVELOPMENT N.A., INC.

By:  April 14th 2021
Amy Klinkenberger, Senior Manager Date

-AND-

MERCEDES-BENZ USA, LLC

By:  April 14th 2021
Gregory Gunther, Manager Date