

DOCKETED

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Sierra Club Comments on CEC ISO 15118 Proposal

Additional submitted attachment is included below.



Date: November 16, 2021

To: Jeffrey Lu
Cc: Hannon Rasool

From: Sierra Club California - Ray Pingle, Joe Halso and Daniel Barad

Subject: Sierra Club Comments on CEC's ISO 15118 proposal.

Transmitted via posting to CEC Docket at:

<https://efiling.energy.ca.gov/EComment/EComment.aspx?docketnumber=19-AB-2127>

Dear Mr. Lu,

First, we would like to express our appreciation for putting together such a comprehensive workshop on your ISO 15118 proposal and for the quality, stature, and appropriateness of the presenters your invited to this forum.

This workshop and the information presented leaves little doubt that your proposal to require charging stations funded by the CEC to support ISO 15118 according to the effective dates you laid out is a critically important step for the State.

Sierra Club California supports the CEC's updated ISO 15118 Proposal as presented at the 11/10/21 workshop.

ISO 15118 readiness will enable strong grid integration of EV charging load and low-cost EV charging for EV drivers by supporting interoperability between electric vehicles, EVSE, EVSP networks, the grid and other stakeholders and technologies. Adopting, supporting and extending this standard will offer a number of benefits to a variety of stakeholders involved including:

1. Allowing essentially any EV to charge with any charger using the CCS or J1772 connector.
2. Supporting Plug and Charge functionality.
3. Allowing easy payment options at any charger without the need for proprietary payment systems.
4. Eventually facilitating smart charging which can both prevent future daily demand surges on the grid while keeping costs as low as possible for EV owners.

5. Eventually enabling V2G allowing export of energy from EVs to support the grid which can mitigate the need for future expensive grid enhancement investments to balance renewable generation, contain ratepayer tariff increases and provide new incentives for consumers to become EV owners.

In the workshop, presenters, panelists and the proposal itself answered proactively or in response to the moderator, critical questions such as:

- How much will this proposal cost and how material are those costs?
- Are there other viable alternatives available?
- Will the implementation of ISO 15118 preclude the use of telematics and other systems?
- Is there adequate manufacturing capacity available to meet California's needs?
- Is there already strong support in Europe and the US among many auto OEMs, EVSE manufacturers and EVSPs?
- Will the CEC assist with some of the interoperability testing of ISO 15118 ready EVSE and will Charin also contribute to this in its Festivals and interoperability programs?
- Will the CEC's proposal require backward compatibility with older standards?

In all cases, the answers supported moving forward with implementing the standard.

Thank you again for the opportunity to provide our input in this important process.

Sincerely,

Ray Pingle
Lead Clean Transportation Volunteer, Sierra Club California

Daniel Barad
Policy Advocate, Sierra Club California

Joe Halso
Staff Attorney, Sierra Club