

DOCKETED

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FLO Comments on ISO 15118 Workshop

Additional submitted attachment is included below.



December 10, 2021

Ms. Patricia Monahan
Commissioner, Energy Commission
1516 Ninth Street
Sacramento, CA 95814
Docket: 19-AB-2127

Re: FLO Comments on CEC ISO 15118 Charger Communication and Interoperability Workshop

Dear Commissioner Monahan,

Thank you for the opportunity to comment on the California Energy Commission's (CEC) ISO 15118 proposal for EV charging stations. We strongly support the CEC proactively collaborating with industry stakeholders in the development of this proposal; such processes exemplify the important benefits of collaboration between the public and private sectors.

FLO is a leading North American charging network for electric vehicles (EV) and a major provider of smart charging software and equipment. FLO offers public, commercial, and residential chargers, including Level 2 EV supply equipment and DC fast chargers. In North America, FLO has deployed over 50,000 charging stations and manages hundreds of thousands of unique charging experiences that transfer 5.5 GWH of energy monthly. FLO's headquarters and network operations are based in Quebec City.

I. We support making chargers ISO 15118 hardware ready.

Scaling EV adoption and charger deployment to phase out the sale of new internal combustion engine vehicles by 2035 will have massive grid impacts. If harnessed correctly, increased charger deployment and use can translate into significant benefits to businesses and consumers, including grid resiliency, downward pressure on rates, and broadening the range of services and business models EV charging companies can offer.

ISO 15118 as a communication protocol holds significant promise to realize these benefits and more, but it will require collaboration between auto manufacturers, charging companies, and utilities to implement it. We applaud the CEC for being forward looking in its "ISO 15118 ready" policy – it should continue to nudge charging companies along in future-proofing their hardware for eventual implementation of ISO 15118. The CEC's proposal sends the appropriate market signal to station manufacturers to incorporate ISO 15118 hardware into their product roadmaps if they have not already done so, while allowing them a reasonable time to comply before the requirement comes

into effect. We also support the CEC's proposal to allow a longer compliance timeline for AC chargers, as the market is less advanced in making these stations ISO 15118 hardware ready.

II. We recommend the CEC continue bolstering research, data, and information sharing among market actors to accelerate ISO 15118 software implementation.

Making chargers hardware ready is an important first step but implementing the ISO 15118 protocol will require significant additional work and coordination. The status of implementation from various auto manufacturers, charging companies, and utilities remains unclear. This lack of market clarity ultimately slows the protocol's adoption. We encourage the CEC to help create more market transparency via public workshops, research, information-sharing sessions between industry stakeholders, and more, to help industry better understand how the market for ISO 15118 is evolving. We believe a clearing house containing all known information about ISO 15118 could be a helpful "one stop shop", especially as it relates to answering the following key questions:

- Which auto manufacturers and charging companies are currently implementing or are planning to implement ISO 15118?
- Which version of ISO 15118 are they implementing? Are they implementing all or parts of the protocol?
- What is the timeline for implementation from various entities?

Answering these questions will help companies like FLO and others better support the CEC's vision for EV charging and contribute to a positive grid impact from the widespread adoption of EVs and EV charging. We look forward to continuing to work with the CEC on this important issue.

Thank you for your consideration,

[electronically submitted]

Cory Bullis
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FLO