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*Comment Received From: Bonnie Datta*  
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**Joint Parties CEC Interop Proposal Final Support Letter**

*Additional submitted attachment is included below.*



December 10, 2021

California Energy Commission  
 1516 Ninth Street  
 Sacramento, CA 95814-5512

**Re: Support for Charger Hardware Communications and Interoperability Proposal**

Advanced Energy Economy, Amply Power, AmpUp, Arrival, Blink Charging, Electrify America, Electriphi, Enel X, E10VBox, EV Connect, ev.energy, FLO, Freewire, Greenlots, Hubject, InCharge Energy, IoTecha, Lucid, Mercedes Benz USA, Mobility House, Next Dimension, Nikola Corporation, Oxygen Initiative, Powerflex-EDF Renewables, SemaConnect, Siemens, Tritium, Veloce Energy, Volvo Group North America, together these **29 Joint Industry and Allied Parties** (“Parties”), respectfully submit this letter of support for the California Energy Commission’s (“the Commission”) attached “ISO 15118 Charger Communications and Interoperability Proposal, Version 2: Updated November 2021” (“the Proposal”). The majority of this coalition previously filed comments in May 2021 on the draft AB 2127 report (“the Report”), emphasizing the importance of interoperability in the transition to a zero-emission transportation future, and the importance of EV-EVSE communication enabled by ISO 15118. Most of this coalition also previously filed comments in September 2021 in support of the Commission’s initial version of the Proposal. Many members of this coalition participated in the Commission’s workshop on November 9, 2021, actively engaging with the Commission Staff and various stakeholders and

finding that there were no issues raised in the workshop that would cause us to withdraw our support for the Proposal. With this letter we further articulate our support for the specific details outlined in the Proposal to support and enable ISO 15118 capable chargers for light duty vehicles, and the phase-in timeline proposed, while urging the Commission to also focus on enabling EVSE to network interoperability.

As articulated in the May 2021 and September 2021 letters, the Parties agree that the Commission should be encouraging the development of standardized, interoperable, cybersecure VGI communication between the EV and EVSE. Critically, this means taking steps to encourage the market to equip networked chargers with the hardware readiness to communicate with EVs over the charging cable. Doing so allows for the necessary communication to flow using ISO 15118, the widely-adopted global open standard being commercially utilized for this pathway. This provides for interoperable, cybersecure communications to create value for customers and the grid through V2G, “plug and charge”, and other functionality.

The Parties appreciate staff’s prompt effort to put forward this action plan to realize a core finding in the AB 2127 report and “...ensure that CEC-funded chargers are hardware-ready to support current and upcoming vehicle features, critical vehicle-grid integration capabilities, and an easier-than-gas user experience.”<sup>1</sup> While recognizing that other pathways for charging-related communication should also be developed, such as vehicle telematics, this proposal will help to ensure that pathways transacting via EVSE can do the same, protecting the prudence of state investments in interoperable charging infrastructure and taking important steps to ensure a smart, flexible and grid-beneficial EV charging ecosystem.

While the proposed phase-in timeline for realizing “ISO 15118-ready” or “hardware-ready for ISO 15118” chargers is reasonable and appropriate, the parties would underscore the importance of the Commission’s proposed market “temperature checks” to ensure sufficient commercial availability of ISO 15118-ready hardware prior to phasing in updated hardware guidelines and to adjust the timeline if warranted.

Failure of California to adequately support standardization and the capabilities it unlocks will hinder achievement of the State’s clean mobility and grid integration goals. It is, therefore, critical that the Commission educate and signal to the marketplace now to enable an adequate phase-in timeframe for these EVSE capabilities, and continue testing of standards, including ISO 15118 as the Proposal outlines.<sup>2</sup> This will also provide time for the industry to continue to refine the associated Public Key Infrastructure (“PKI”) implementation details to ensure adequate cybersecurity protections, as has been successfully achieved in other industries such as finance, telecom, etc.

The Parties also urge the Commission to take action on the Report’s findings that the Commission should prioritize chargers certified to be third-party Open Charge Point Protocol (“OCPP”)

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<sup>1</sup> Proposal at p. 1.

<sup>2</sup> This could be done through programs being proposed by the Commission such as ViGIL and the Interoperability Testing Events

compliant when procured with public funds. With an existing independent third-party OCPP certification process, it is appropriate for this to be a requirement of EVSE supported with public funds once an adequate phase-in timeline is established in consultation with the EV charging industry for hardware and software providers to comply, similar to what is outlined for ISO 15118 readiness. Additionally, the parties encourage the Commission to expand the scope of the proposal to include medium- and heavy-duty vehicle (MDHV) charging infrastructure the Commission may incentivize that uses the CCS or J1772 connector, as this charging infrastructure from a technology standpoint is the same as what serves light duty vehicles.

The Parties commend the Commission for taking steps to help ensure the state realizes a flexible, interoperable and driver friendly EV infrastructure deployment in California as is essential to meet the state's EV adoption goals.

The Parties appreciate the opportunity to submit these comments.

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