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21-12-10 ChargePoint Comments on CEC Proposal for ISO 15118

Additional submitted attachment is included below.

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December 10, 2021

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

Re: 19-AB-2127 - Implementation of Ab 2127 Electric Vehicle Charging Assessments, ISO 15118 Charger Communications, and Interoperability Proposal (Nov 2021)

ChargePoint appreciates the opportunity to provide comments to California Energy Commission (CEC) ISO 15118 Charger Communication and Interoperability Proposal.

ChargePoint believes it is premature to require hardware in funding programs for a standard that has not been finalized. Further standard development is needed to address critical gaps in security and functionality before the CEC mandates the inclusion of hardware to support ISO 15118.

Allow IEC and ISO Settle Issues
ChargePoint stated earlier this year (On February 26, 2021) in our comments, "*IS015118 may be appropriate for CEC funded R&D grants such as BESTFIT*." However, it is premature to require hardware for unfinalized standards for all CEC-funded light-duty vehicles chargers starting in 2022 and 2023. Ongoing work to develop future versions of ISO 15118 is underway through the ISO/IEC Joint Working Group and in the SAE EV Charging PKI Collaborative Research Project to address cybersecurity risks posed by the current and upcoming versions. The SAE PKI work is anticipated in the second half of 2022. Therefore, moving forward with this proposal to mandate ISO/IEC 15118 is premature.

Proposed Timeline of Implementation
ChargePoint believes it would be wise to modify the proposed "temperature check timeline. This proposal should provide flexibility to reflect an off-ramp event if ISO 15118 working group standards are not finalized. As previously stated, the ISO/IEC Joint Working Group is underway, as is the SAE PKI Charging Collaborative Research Project and is expected to be completed in the second half of 2022. The temperature check should only be conducted after the finalization of the standard.

Temperature Check Approach
Linking the implementation requirements to a limited number of brands alone seems imprudent and not representative of the larger EV charging industry. Triggering requirements based on the number of brands that can meet the condition does not necessarily translate into having the manufacturing capacity to scale at the pace necessary to meet the demand of CEC programs. We

would encourage the consideration of additional metrics that consider the number of units produced to date to ensure the ability of the supply chain to provide all vendors easy access to the necessary hardware.

Temperature Check – Timeline
CEC should provide additional time between any temperature check at hardware requirements. There are two concerns with the timeline. First, if a manufacturer's product must be updated to become compliant; four months is too short of a timeline. Updating products and incorporating changes into the manufacturing process will take significantly more time. At a minimum, there should be at least one year between the temperature check and the implementation date to allow time for any necessary re-designs, procurement, and manufacturing of products required to allow all brands to compete on a level playing field when the requirement becomes effective.

Second, we are concerned that the supply chain is not ready to produce the necessary chips to meet these requirements. California mandating these requirements would significantly increase the demand for the underlying hardware. As CEC is aware, all major industries across the globe are facing delays in the supply chain because of the Covid-19 Pandemic that shut down entire supply chains.

Expand "Brands" to include Chip Manufacturers.
In addition to ensuring that multiple brands of EVSE can demonstrate this technology, there will be numerous manufacturers of the underlining hardware needed to produce this chip. In addition to our concerns about the supply chain ramp-up, we believe it is also vital to ensure sufficient diversity in options to acquire that underlying hardware. As we have seen recently with the chip shortage for numerous products, including computers, autos, and appliances, ensuring a robust supply chain of potential vendors is critical. Ensuring that there is enough capacity in the market for the underlying hardware will be essential for programmatic success.

The Stated Use Case
Not all charging equipment is used in the same way and may not use this underlying hardware. The document circulated states two reasons CEC is exploring this requirement, VGI integration and easier than gas charging experience. It is important to note that many energy management functions such as demand response, load sharing, power management, etc., do not need ISO 15118 functionality. There may be excellent reasons to allow certain use cases to avoid this requirement or demonstrate similar functionality by a different means.

I appreciate your consideration of our comments. Please do not hesitate to contact me at cesar.diaz@chargepoint.com if you have any questions or if we can provide additional information to help inform the assessment.

Sincerely,

Cesar Diaz
Senior Manager, Public Policy
ChargePoint