

DOCKETED

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on V2G Inverter List

Additional submitted attachment is included below.

From: [Jose Torre-Bueno](#)
To: [Energy - Docket Optical System](#)
Subject: Center for Community Energy comments on docket number 19-AB-2127 and V2G Inverter List
Date: Wednesday, May 25, 2022 2:18:25 PM

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The Center for Community Energy is a nonprofit dedicated to promoting distributed energy systems in California. We see V2G as a major potential source of energy storage and grid stabilisation in the future. With this in mind we respectfully submit the following comments on docket number 19-AB-2127.

Given that the CEC's workshops on Grid Reliability have anticipated power shortfalls essentially every fall for the foreseeable future and given that V2G capable vehicles and EVSE are just coming on the market we suggest that it is important that the implementation of bidirectional EVSE not be delayed by administrative matters. Therefore, our overall comment is that the implementation of the list should be considered an urgent matter so that EVSE manufacturers who are currently in UL testing do not suffer market delays when they release their products this year.

As to the specific questions raised in the workshop we have the following answers:

1) Which certifications should the V2G Inverter List track at launch?

We suggest all three UL1741, 1741-SA and 1741-SB are important

2) To what extent should the V2G Inverter List attempt to accommodate onboard inverters (AC V2G) at launch,

Given that the standards for onboard inverters are not as well developed we suggest that the launch of the list should not be delayed to include on board inverters. The market for on board bidirectional inverters is mostly to serve vehicle to load which is irrelevant to Rule 21.

3) Should the V2G Inverter List track the model numbers of chargers that contain inverters, or the model numbers of the inverters themselves?

It should track chargers since that is the item sold. Customers are not going to switch out inverters. When on-board inverters are included this would mean tracking vehicle models.

4) Should any parameters besides UL certification be tracked as part of the V2G Inverter List?

The CEC has recommended that all EVSE conform to ISO 15118 so the list should show what level of 15118 the EVSE conforms to (particularly -20)

SCE in their presentation said that they require demonstration of Phase 2 communication and attestation of smart inverter functions 1 and 8 as defined in IEE1547 so these should be listed also.

The connector type should be listed assuming the list is of complete charges not inverter subsystems.

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