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Comments of Sunrun Inc on V2G Inverter List

Additional submitted attachment is included below.

March 31, 2022

Via Electronic Filing

Hannon Rasool
Deputy Director, Fuels and Transportation Division
California Energy Commission
715 P Street
Sacramento, California 95814

Re: Sunrun Comments on Vehicle-to-Grid Inverter List

Mr. Rasool:

Pursuant to the notice issued May 3, 2022 by the California Energy Commission ("CEC"), Sunrun Inc. ("Sunrun") submits the following responses to the CEC's questions regarding the design and implementation of its Vehicle-to-Grid ("V2G") Inverter List.

1. *Which certifications should the V2G Inverter List track at launch? UL 1741, UL 1741-SA, UL 1741-SB, or a combination thereof?*

Certifications tracked should be consistent with existing Rule 21 standards to allow for interconnection for a vehicle system within standard utility processes. Today, Sunrun understands that Rule 21 requires UL 1741-SA for the V2G use case, with planned transition for all new interconnection applications in March 2023 requiring UL 1741-SB-certified inverters.

2. *To what extent should the V2G Inverter List attempt to accommodate onboard inverters (AC V2G) at launch, versus focusing on offboard inverters (DC V2G)?*

We believe it is premature to include AC V2G at launch, based on standards not being fully developed. We recommend focusing on DC V2G.

3. *Should the V2G Inverter List track the model numbers of chargers that contain inverters, or the model numbers of the inverters themselves? If the former, how would the list accommodate onboard inverters? If the latter, how would a charger manufacturer prove that a listed inverter is indeed used in a particular charger model?*

Based on current lists, the model numbers of the inverters from certification documentation should be used for V2G tracking purposes. Sunrun sees no reason to prohibit a V2G tracking list for chargers, as it is likely that a stand-alone EV charger would need to certify to UL 1741 in order to comply with Rule 21. The CEC should not assume that the inverter must be contained within the charger; DC V2G equipment manufacturers may pursue different configurations.

4. *Should any parameters besides UL 1741 certification be tracked as part of the V2G Inverter List? For example, connector type, communication standards, and so on?*

Sunrun does not see a need to track any additional standards for this V2G Rule 21-certified inverter list. If the intention is to ensure that a given charger meets the Rule 21 requirements, it should be kept to just these requirements. Otherwise, there is a risk of disqualifying novel approaches by making the CEC prescriptive to approach.

Sunrun appreciates the opportunity to provide these comments and looks forward to continued collaboration with the CEC and stakeholders on the development of bidirectional vehicle charging.

Respectfully submitted,

/s/ Steven Rymsha
Steven Rymsha
Director Grid Solutions, Public Policy
Sunrun Inc.
225 Bush St., #1400
San Francisco, CA 94104
Tele: (808) 220-7377
Email: steven.rymsha@sunrun.com