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Cyber Security and Grid Interoperability

Thank you for the opportunity to provide comment regarding the State of California's NEVI Deployment.

California has long been a thought leader in the integration of Distributed Energy Resources (DERs) into the electric grid. We have seen that proposed NEVI deployments do not consider the integration of charging infrastructure into the electric grid as one of the goals of the deployment. Specifically, states promoting the use of a combination of Open Charge Point Protocol (OCPP) and ISO 15118 for network integration of charging stations preclude integration of these assets into the electric grid. I.e. deployments that network charging infrastructure using OCPP and ISO 15118 are not treating charging infrastructure as a DER.

We believe that treating charging infrastructure as a DER is necessary to maximize the value of these assets for grid reliability and commercial opportunity. Considering DERs as one of numerous asset types in the grid allows for unified integration of DERs including EV, EVSE, stationary battery, photovoltaic, large loads such as HVAC, water pumps and more. In other words, an ecosystem based on the Tower of Babel will never meet the short and long term needs of the modern grid. In addition, networking standards used to integrate DERs into the electric grid must be vetted by independent organizations capable of evaluating the security and protection of a strategic asset of the nation such as the electric grid.

We believe that NEVI funded charging infrastructure in California must mandate that all networking standards used are in the SEPA Catalog of Standards (CoS). (<https://sepapower.org/knowledge/catalog-of-standards/>) The CoS ensures standards of grid applicability on the grounds of cybersecurity, architecture and interoperability. There are currently over 80 standards in the CoS. Note that neither OCPP nor ISO 15118 are currently in the SEPA CoS.

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With federal dollars flowing to charging providers who deploy under NEVI requirements, California can make significant national strides to a truly multi-asset, interoperable and secure grid by including only networking standards vetted by NIST, SEPA, SGIP, and the State's own Rule 21. Today, California's Rule 21 mandates networking requirements for EV V2G (for fast charging stations) using standards in the CoS.

Whether NEVI funded deployments include V2G or not, the momentum associated with the NEVI deployments will change the ecosystem for the long term. Harmonizing these deployments with Rule 21 will prevent the ecosystem and associated infrastructure for electric vehicles from adopting siloed standards that provide little to no accessibility to the utilities that support them.

For these reasons, we urge the CEC to mandate that all networking standards associated with NEVI funded deployments use standards that are inherently multi-asset and in the SEPA CoS.