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ChargePoint Comments on Staff Workshop on Charging Interoperability and Collaboration Yard Funding Concept

Additional submitted attachment is included below.



ChargePoint, Inc.
240 East Hacienda Avenue | Campbell, CA 95008 USA
+1.408.841.4500 or US toll-free +1.877.370.3802

May 24, 2023

California Energy Commission
Re: Docket 22-EVI-06
1516 Ninth Street Sacramento, CA 95814

Submitted to on-line portal:
<https://efiling.energy.ca.gov/EComment/EComment.aspx?docketnumber=22-EVI-06>

Re: Docket 22-EVI-06, Staff Workshop on Charging Interoperability and Collaboration Yard Funding Concept

ChargePoint appreciates the opportunity to provide comments on the California Energy Commission (CEC)'s potential Charging Interoperability and Collaboration Yard Funding Concept ("Charge Yard"). This concept provides a unique opportunity for the industry to collaborate and support charging interoperability, develop standards and certifications, and advance next generation charging features. ChargePoint commends the CEC for their efforts to address challenges regarding interoperability in order to support industry and customer needs, as well as the state's transportation and decarbonization goals.

ChargePoint has enjoyed numerous partnerships with the CEC, and together we have helped accelerate EV charging deployment in rural communities, along highway corridors, and on multi-family properties. Since 2007, ChargePoint has been committed to making it easy for businesses and drivers to go electric with one of the largest electric vehicle (EV) charging networks and a comprehensive portfolio of charging solutions. We appreciate the engagement efforts of the CEC staff and hope the comments below help inform this process.

Question #1: Should CEC specify minimum square footage and/or electrical capabilities? If interoperability is the focus, does lower power suffice (say, 50 kW)? What about testing at higher powers (>=150 kW)?

Regarding the physical space of Charge Yard, ChargePoint provides several recommendations. First, Charge Yard will need to be located within the Los Angeles Basin due to the proximity of several Original Equipment Manufacturers (OEMs)' test areas. There will also need to be a minimum of 10MW to feed into the yard. ChargePoint also recommends that Charge Yard have year-round, 24/7 security guards. The CEC also proposes that the space only use existing spaces; however, the CEC should also consider new spaces as the market may be unable to produce a space large enough to accommodate Charge Yard. In fact, it is critical that the space be large enough to avoid potential equipment damage. Further, ChargePoint recommends that the space be required to accommodate medium- and heavy-duty vehicles. Regarding operations, ChargePoint recommends that Charge Yard enable OEMs' ability to test vehicles in private and in public.

Question #2: Is CharIN CCS Extended the appropriate certification to require? Are there other certifications for ISO 15118 CEC should consider instead?



ChargePoint is a strong supporter of interoperability and open standards and supports requiring chargers to conform with existing standards. However, ChargePoint cautions the CEC against requiring pending standards as these standards have not completed the standards making process that includes careful and critical examination of their technical, security, and safety issues and allows hardware and software manufacturers to align with requirements in timelines appropriate for market development. Currently, the Open Charge Alliance (OCA) does not have its testing program for certification of OCPP 2.0.1 available yet. There is also a lack of ISO 15118-2 certification testing procedures for AC chargers today. Similarly, CharIN CCS Extended certification for DC chargers is not available yet, although expected to become available in 2023. Thus, it is premature to require these certifications before they are ready, as doing so may increase the risk of stranded assets. Any testing should adhere strictly to standard organization specifications and should not include any additional material developed by non-standards making organizations.

Question #14: Is requiring three onsite events per year needed or appropriate? Are there are other requirements CEC should include to foster industry collaboration?

ChargePoint recommends that Charge Yard host a minimum of three onsite events per year that are similar in size to the Vehicle Interoperability Testing Symposium (VOLTS) events. ChargePoint does not oppose additional onsite events that may be smaller in scale. ChargePoint also recommends that external footage be available for the large test events. Additionally, ChargePoint recommends clarifying that these events be similar to the VOLTS events by including several different OEMs and Chargepoint Operators (CPOs).

Question #15: Is a coalition the most sensible and effective set up for Charge Yard? Or should Charge Yard be hosted by a non industry (more neutral?) entity?

It is pivotal that Charge Yard be hosted by a non-industry entity. "Neutrality" is necessary to guarantee the security of the equipment and of competitive information. Any non-industry entity selected to set up Charge Yard must ensure neutrality of the entity and its staff. Entities selected should not be engaged in any standard, technical specification, or test case development, rather strictly testing to the specific standards.

Question #16: Should Charge Yard specify minimum coalition requirements? For example, minimum one automaker, one utility, one test tool developer, one charger manufacturer, and so on.

A coalition should include CPOs, OEMs, and Test Equipment Manufacturers, with the leading entity to be agreed upon by the entire coalition. ChargePoint recommends that the coalition represent, at minimum, two-thirds of the market share of each entity type operating in California.

Conclusion

Thank you for your consideration of our comments. ChargePoint looks forward to continued collaboration with the CEC to accelerate California's transportation electrification goals. Please do not hesitate to contact me at matthew.deal@chargepoint.com, if you have any questions or if we can provide additional information.

Sincerely,

/s/ Matthew Deal

Matthew Deal



Senior Manager, Utility Policy
ChargePoint, Inc.

Matthew.Deal@ChargePoint.com