

DOCKETED

Docket Number:	22-EVI-06
Project Title:	Vehicle-Grid Integration
TN #:	250318
Document Title:	CalETC's Comments on Proposed Charging Interoperability and Collaboration Yard Funding Concept
Description:	N/A
Filer:	System
Organization:	CalETC
Submitter Role:	Public
Submission Date:	5/24/2023 3:59:27 PM
Docketed Date:	5/24/2023

*Comment Received From: CalETC
Submitted On: 5/24/2023
Docket Number: 22-EVI-06*

**CalETC's Comments on Proposed Charging Interoperability and
Collaboration Yard Funding Concept**

Additional submitted attachment is included below.



May 24, 2023

California Energy Commission
Re: Docket No. 22-EVI-06

Submitted via electronic commenting system for docket 22-EVI-06

Re: Workshop on Charging Interoperability and Collaboration Yard Funding Concept

The California Electric Transportation Coalition (CalETC) appreciates the opportunity to provide comments on the Charging Interoperability and Collaboration Yard Funding Concept (Charge Yard) workshop held on May 5th. CalETC greatly appreciates Staff's work on the proposed concept and advancing reliable, seamless, and innovative EV charging in the state.

CalETC supports and advocates for the transition to a zero-emission transportation future to spur economic growth, fuel diversity and energy independence, contribute to clean air, and combat climate change. CalETC is a non-profit association committed to the successful introduction and large-scale deployment of all forms of electric transportation. Our Board of Directors includes representatives from: Los Angeles Department of Water and Power, Pacific Gas and Electric, Sacramento Municipal Utility District, San Diego Gas and Electric, Southern California Edison, Southern California Public Power Authority, and the Northern California Power Agency. In addition to electric utilities, our membership includes major automakers, manufacturers of zero-emission trucks and buses, electric vehicle charging providers, autonomous electric vehicle fleet operators, and other industry leaders supporting transportation electrification.

CalETC supports the Charge Yard concept and encourages staff to consider CalETC as a resource to help find additional funding through the state budget and to help develop industry partnerships. Charge Yard would be the light-duty counterpart to the Electric Truck Research and Utilization Center (eTRUC) established by the Research Hub for Electric Technologies in Truck Applications (RHETTA). To ensure efforts are not duplicated and relevant knowledge is shared, we recommend the funding recipient for Charge Yard be required to coordinate and collaborate with eTRUC, the Vehicle Grid Innovation Lab (ViGIL), and the Vehicle Interoperability Testing Symposium (VOLTS).

CalETC recommends Charge Yard support bidirectional or vehicle-to-everything (V2X) test beds, including vehicle-to-home, vehicle-to-building, and vehicle-to-grid. Collaboration should include utilities, automakers, the Society of Automotive Engineers (SAE), and the Electric Power Research Institute (EPRI) to help standardize the controls and safety for these systems. Today, V2X systems are expensive and standardizing the controls, implementation procedures, and safety features will help reduce costs. We also recommend including cybersecurity as one of the components that can be evaluated at Charge Yard.

The CalGreen Code was recently amended to allow newly constructed multifamily housing to use low-power level-2 outlets (208/240-volt 30-ampere minimum) for EV charging instead of fully

May 24, 2023

Workshop on Charging Interoperability and Collaboration Yard Funding Concept

Page 2

installed EVSE. CalETC continues to have concerns about the safety and long-term durability of using outlets for EV charging at newly constructed multifamily housing. That said, we are supportive of accommodating innovative solutions that includes outlet-based EVSE technology and underscore the need for study and data to inform standards development in this space as new technologies, use cases, and solutions emerge. We believe Charge Yard could play a role in determining which outlet designs are appropriate for multifamily housing and which ones present safety hazards or other issues. Therefore, we recommend including outlets in the suite of technologies that should be evaluated and increasing the number of permanent EVSE to accommodate a number of outlets that could be tested individually or as part of an automated load management system. We do not make a recommendation as to what that increased number of permanent EVSE should be, just that the number of outlets should not reduce the number of DC and AC EVSE that can be tested. Additionally, we recommend including submetering as a component that can be evaluated at Charge Yard.

Finally, we agree with other commenters that since the focus of Charge Yard is on light-duty changing, the proposed concept should be renamed to something like "Charge Park" because "Yard" is often associated with medium- and heavy-duty vehicles.

Thank you for your consideration of our comments. Please do not hesitate to contact me kristian@caletc.com should you have any questions.

Sincerely,



Kristian Corby, Deputy Executive Director
California Electric Transportation Coalition