

**DOCKETED**

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**EVgo Comments - Staff Workshop on Charging Interoperability and Collaboration Yard Funding Concept**

*Additional submitted attachment is included below.*

May 25, 2023

California Energy Commission  
715 P Street  
Sacramento, CA 95814

**Re: Docket No. 22-EVI-06 – Staff Workshop on Charging Interoperability and Collaboration Yard Funding Concept**

EVgo appreciates the opportunity to submit comments in response to California Energy Commission's (CEC) Staff Workshop on Charging Interoperability and Collaboration Yard Funding Concept (Charge Yard). EVgo is a leader in charging solutions, building and operating the infrastructure and tools needed to expedite the mass adoption of electric vehicles (EVs) for individual drivers, rideshare and commercial fleets, and businesses. Since its founding in 2010, EVgo has led the way to a cleaner transportation future and its network has been powered by 100% renewable energy since 2019 through the purchase of renewable energy certificates. As one of the nation's largest public fast charging networks with over 600,000 customer accounts, EVgo's owned and operated charging network includes over 900 fast charging locations, 60 metropolitan areas and 30 states.

EVgo supports the CEC's interest in the Charge Yard concept as a vehicle for promoting interoperability and implementation of standards that will accelerate widespread transportation electrification. EVgo's Innovation Lab in El Segundo, California, has been a critical component of EVgo's efforts to improve the customer charging experience necessary to accelerate EV adoption. Before deploying any new equipment in the field, EVgo thoroughly tests its hardware, software, and vehicle interoperability to ensure it meets stringent performance standards.<sup>1</sup>

As the number of new EV and EVSE models coming to market rapidly expands, increased focus on interoperability is needed to reduce the risk of no-charge events driven by vehicle-charger communication issues. As the potential combinations of EVs and EVSEs increases exponentially, the stakeholder community needs to develop more systematic approaches to supporting interoperability. These issues cannot be solved by the EV charging industry alone; coordination from multiple stakeholders, including automakers and charging equipment manufacturers, is necessary to improve the charging experience in line with customer needs. For this reason, EVgo supports the CEC's interest in encouraging coalitions of stakeholders to respond to the Charge Yard solicitation.

In addition to supporting testing and development of ISO 15118, EVgo encourages the CEC to expand the scope of the Charge Yard concept to include testing and evaluation of vehicle-charger interoperability issues that result in no-charge events. These issues, which include hardware and signal communication errors, represent near-term roadblocks to a seamless customer charging experience and require industry collaboration to address across the whole charging ecosystem. The Charge Yard concept is an appropriate venue for addressing these challenges that broadly affect the EV and EV charging industries.

To accomplish the goals of the Charge Yard, EVgo strongly recommends requiring power levels in excess of 50 kilowatts for fast chargers; interoperability issues with higher power charging that is becoming increasingly common today may not be fully identified at this lower level of power. Conformance testing

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<sup>1</sup> <https://www.evgo.com/blog/charging-into-the-future-of-range-confidence-with-evgo-renew/>

must also include vehicles as well as chargers, as this will help identify interoperability issues driven by the EV and not by the EVSE. EVgo also seeks greater clarification on the rationale for including transfer switches in the list of eligible costs for the Charge Yard: CharIN test cases were made with the assumption that automated equipment would be used.

EVgo looks forward to the continued development of the Charge Yard concept and to providing additional feedback to the CEC to advance interoperability.

Respectfully submitted this 25<sup>th</sup> Day of May,

Noah Garcia  
Manager, Market Development and Public Policy  
EVgo Services, LLC  
11835 W. Olympic Blvd., Suite 900E  
Los Angeles, CA 90064  
Tel: 310.954.2900  
E-mail: [noah.garcia@evgo.com](mailto:noah.garcia@evgo.com)