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EV Charging Association - Interoperability Comments

Additional submitted attachment is included below.

December 22, 2023

California Energy Commission
Docket Unit, MS-4
Docket No. 22-EVI-04
715 P Street
Sacramento, California 95814

RE: 22-EVI-06 and Electric Vehicle Charging Interoperability

Dear California Energy Commissioners and Staff,

The Electric Vehicle Charging Association (EVCA) appreciates the opportunity to submit comments in response to the Electric Vehicle (EV) Charging Interoperability Workshop held on November 30, 2023.

EVCA is a not-for-profit trade organization of 22 leading EV charging industry member companies and two zero-emission autonomous fleet operators. The association was established in 2015 to comprehensively represent the entire EV charging value chain and provide a collective industry voice for decision-makers in California.

EVCA supports the CEC's statement on charging interoperability and its intent to facilitate information sharing and testing between EV charging companies and automakers to enhance overall interoperability. We recommend that the CEC continue to work with the California Air Resource Board (CARB) on vehicle interoperability. In particular, interagency coordination is valuable for widespread implementation of plug and charge capabilities between EVs and EV chargers.

Below you will find EVCA's responses to the CEC's questions during the workshop.

CharIN is developing a "CCS Extended" certification that verifies ISO 15118-2 conformance. CEC staff believes CharIN CCS Extended may be an appropriate future requirement for certain CEC projects. Are there other available ISO 15118 certifications or conformance procedures that would be more appropriate?

EVCA supports the development of "CCS Extended" as a conformance test. However, CCS Extended is not yet finalized. EVCA encourages the CEC to provide ample time to review the finalized version of the test before its inclusion in future CEC projects.

CEC staff proposes potentially allowing ISO 15118-20 and OCPP implementation and certification costs as eligible costs in certain CEC projects. Would this be an

effective use of public funds, or would funds be more effective elsewhere to support broad interoperability?

EVCA recognizes that ISO 15118-20 is not yet ready for widespread implementation. However, once -20 is finalized and a viable conformance regime is established, EVCA supports using public funding for implementation and certification costs. However, EVCA recommends that the CEC consider providing such funding support as part of a separate program and not tied to a specific charging deployment project. As we've seen with other new EV and EVSE specific certification regimes, there is a steep learning curve and limited resources between standard bodies, testing labs, test tool developers, EVSE OEMs and EV OEMs. Funding to support this would be impactful.

With the rapid growth in this relatively new industry, there is a skilled and experienced resources gap, particularly for specialized work like standards development and implementation. As the regulatory requirements (ISO 15118, OCPP 2.0.1, NEVI, etc.) ratchet up, the demands on these resources are outpacing the ability to hire and train skilled workers. Funding will allow charging companies to increase the resources they can dedicate to achieve these objectives more quickly.

Coordination with CARB is essential to ensure that the same interoperability standards are being adopted on the vehicle side on a similar timeframe.

Existing regulations require CSOs to maintain OCPI capability. Is OCPI the preferred protocol to enable roaming agreements? Are there limitations within OCPI that should be addressed?

EVCA is supportive of OCPI as the preferred protocol to enable roaming agreements. OCPI is a free, open-source protocol that is continually improved upon by stakeholders and users via the EV Roaming Foundation. EVCA does not have comments on how to address limitations within OCPI but recognizes that there is no conformance test currently available.

How should the CEC support the development of roaming agreements? Alternatively, should potential roaming requirements be structured in a certain way to support replicability of agreements, a level playing field, and/or the inclusion of smaller CSOs?

EVCA agrees with the CEC that roaming helps simplify drivers' charging experiences and increases customers' choices with mobile apps. We strongly encourage the CEC to provide companies flexibility to design their roaming agreements that best align with their business models. To best support the development of roaming agreements, EVCA encourages the CEC to hold one or more workshops to better

define its goals with roaming, discuss the current state of roaming in the U.S., and review lessons learned from companies' experiences to date facilitating roaming. Bringing together diverse stakeholders for such ad discussion can help inform companies' strategies to implement this further.

EVCA appreciates the CEC's thoughtful consideration of charging interoperability and its continued ZEV leadership as the state works to meet its ambitious transportation electrification and climate goals. Widespread adoption of EVs is a critical pillar of California's climate, air quality, and economic goals, and interoperability is a key element of ensuring that EV charging can play a successful role in EV adoption across the state.

Sincerely,

Reed Addis
Governmental Affairs
Electric Vehicle Charging Association