

DOCKETED

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SWTCH Comments on SB 123 Pre-Rulemaking Workshop

Additional submitted attachment is included below.

June 4, 2024

California Energy Commission
715 P Street
Sacramento, CA 95814

Re: Docket No. 24-TRAN-02 - Comments on Proposed EV Charger Standards Under Senate Bill 123

Dear California Energy Commissioners and Staff:

SWTCH respectfully submits these comments on the Proposed EV Charger Standards Under Senate Bill 123 in response to a CEC workshop hosted on May 22, 2024. SWTCH supports California's efforts to align the EV charging industry on standards that will improve the driver experience and help achieve the state's EV charging deployment goals.

About SWTCH

SWTCH is a leading provider of electric vehicle (EV) charging and energy management solutions for multifamily, commercial, and workplace properties across North America. Our end-to-end solution optimizes EV charging usage and manages load to benefit drivers, property owners, and the grid. SWTCH has deployed more than 10,000 chargers across North America, with a strong focus on equitable access. SWTCH's charging management platform is built upon a foundation of open communication standards and interoperability to prevent stranded assets and to ensure future flexibility, scalability, and innovation.

Comments

- 1. Should ISO 15118 Plug and Charge also be required on L2 chargers?** ISO 15118 Plug and Charge adds convenience for EV drivers, enhances the security of cyber-physical infrastructure, and enables other benefits such as vehicle-to-grid (V2G) integration and participation in transactive energy markets. For these reasons, Plug and Charge is becoming a more widespread part of the EV charging experience, and accordingly, SWTCH supports requiring L2 chargers today be hardware enabled to support Plug and Charge.
- 2. How should the CEC verify compliance with ISO 15118 and Plug and Charge?** Once the CEC requires a specific Plug and Charge verification, many stakeholders will conduct test harness and verification tests. SWTCH supports using the CharIN conformance test for Plug & Charge via ISO 15118-2. Based on the testing event outcomes report from the CharIN Festival in Long Beach, CA in May 2023, several charger manufacturers have implemented ISO 15118 and passed the test successfully.¹ Although CharIN is still developing a "test harness tool," this tool is not a valid reason for excluding L2 chargers from compliance, as chargers can be hardware-ready for ISO 15118-2 and receive firmware updates over the air once all components are ready. SWTCH is supportive of having, at minimum, hardware readiness standards for ISO 15118 and OCPP 2.1 features.

¹ The Volts 2023 Testing Event Data report prepared by DEKRA on behalf of CharIN North America is not available to the public. SWTCH would gladly provide a copy of this report upon request.

- 3. Should the CEC consider on-site signage requirements for chargers?** Most companies display all relevant information through their mobile or web-based applications. On-site signage may add unnecessary costs and can delay charger deployment for limited benefit to EV drivers. Moreover, signage is likely to be further complicated by local zoning and permitting requirements that may limit the use of signage at EV charging properties. For these reasons, the CEC should consider any on-site signage requirements with these factors in mind, input from stakeholders, and in alignment with relevant site design standards (e.g. NEVI requirements).

In Closing

SWTCH appreciates the steps that the CEC is taking to improve EV infrastructure and the charging experience across California. We look forward to working with stakeholders to advance best-in-class EV charging standards, and appreciate the opportunity to comment on these matters. If you have questions or if I can provide more information, please contact me at ben.brint@swtchenergy.com or 415.535.8444.

Respectfully,



Ben Brint
Policy Manager, Western U.S.