

DOCKETED

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CalETC's Comments on CEC's Workshop on Proposed EV Charger Standards under SB 123

Additional submitted attachment is included below.



June 6, 2024

California Energy Commission
California Department of Transportation
Re: Docket No. 24-TRAN-02

Submitted electronically to <https://efiling.energy.ca.gov/EComment/EComment.aspx?docketnumber=24-TRAN-02>

Re: Workshop on Proposed EV Charger Standards under SB 123

The California Electric Transportation Coalition (CalETC) appreciates the opportunity to provide comments on the CEC's workshop on Proposed EV Charger Standards under SB 123. CalETC would like to thank the CEC for all your hard work and commitment to meeting California's charging infrastructure goals.

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 CEC's work to ensure widespread access to EV charging and to develop standards that allow drivers to easily use and pay for charging. CalETC supports using the NEVI standards for public DC Fast Charging (DCFC) so that all these chargers are subject to the same requirements and provide ubiquitous charging experiences for EV drivers.

CalETC recommends the CEC continue to evaluate whether ISO 15118 is appropriate for Level 2 (L2) chargers. While ISO 15118 is being implemented into DCFCs, at the CEC's ISO 15118 Update Workshop on May 13th we learned that conformance testing and certain functionality, including Plug and Charge and vehicle-to-grid standards, are still being revised or not ready. CalETC recommends focusing our efforts on implementing ISO 15118 for DCFC before expanding to L2.

CalETC recommends supporting the development of a conformance testing tool for ISO 15118 that can ensure companies are implementing ISO 15118 in the same way. A tool that can be widely used by auto manufacturers, charging equipment manufacturers, and others to independently verify that their products are meeting the appropriate standards would ensure conformance and speed product delivery. Once a conformance testing tool is in place, then it will be more palatable

for companies to evaluate the costs and benefits of implementing ISO 15118 in their products with the certainty that their products will be compatible with others in the marketplace.

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

Kind regards,

A handwritten signature in blue ink, appearing to read 'K. Corby', with a long horizontal flourish extending to the right.

Kristian Corby, Deputy Executive Director
California Electric Transportation Coalition