

**DOCKETED**

<b>Docket Number:</b>	24-FDAS-04
<b>Project Title:</b>	Flexible Demand Appliance Standards for Electric Vehicle Supply Equipment
<b>TN #:</b>	260776
<b>Document Title:</b>	California Electric Transportation Coalition Comments - CalETC's Response to the RFI on FDAS for EVSEs
<b>Description:</b>	N/A
<b>Filer:</b>	System
<b>Organization:</b>	California Electric Transportation Coalition
<b>Submitter Role:</b>	Public
<b>Submission Date:</b>	12/20/2024 4:32:11 PM
<b>Docketed Date:</b>	12/20/2024

*Comment Received From: California Electric Transportation Coalition  
Submitted On: 12/20/2024  
Docket Number: 24-FDAS-04*

## **CaIETC's Response to the RFI on FDAS for EVSEs**

*Additional submitted attachment is included below.*



December 20, 2024

California Energy Commission  
715 P Street  
Sacramento, CA 95814  
Re: Docket No. 24-FDAS-04

Submitted electronically to [https://efiling.energy.ca.gov/EComment/EComment.aspx?  
docketnumber=24-FDAS-04](https://efiling.energy.ca.gov/EComment/EComment.aspx?docketnumber=24-FDAS-04)

**Re: Flexible Demand and Load Shifting in California for Electric Vehicle Supply  
Equipment**

The California Electric Transportation Coalition (CalETC) appreciates the opportunity to provide comments on the Request for Information (RFI) on Flexible Demand and Load Shifting in California for Electric Vehicle Support Equipment (EVSE). CalETC would like to thank the CEC for all your hard work on developing the RFI and commitment to energy efficiency through Flexible Demand Appliance Standards (FDAS).

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 recommends that the Efficiency Division coordinate closely with the Fuels and Transportation Division personnel that are working on EVSE reliability, interoperability, roaming, and bidirectional charging. We are supportive of the CEC's goal to enable shifting the time and rate of vehicle charging to enhance grid reliability, lower GHG emissions, and save consumers money. This goal will continue to become more and more important as light-, medium, and heavy-duty EVs continue to grow in popularity. It is critical that all the CEC's standards and regulations dovetail together into a coherent and predictable framework so the industry can plan product lines and implement standards with sufficient runway and certainty that the whole industry can move in the same direction.

CalETC recommends that the CEC coordinate closely on the development of the FDAS with all Investor Owned Utilities and Publicly Owned Utilities in California. Not all utilities and customers are located within CAISO territory, and even utilities located within CAISO territory may have

unique needs and constraints when it comes to dispatching resources and shifting customer load. The dispatch needs of the local utility and balancing authority should be considered when establishing statewide regulations.

After the CEC reviews the information submitted for the RFI, CalETC recommends releasing a summary document with a designated scope for the FDAS. We recognize that the RFI is intentionally broad in scope and CalETC supports this initial effort to gather a wide range of information on charging use cases, industry practices, and existing standards. Like vehicle-to-grid, building, or load applications, FDAS appears to be best suited for long dwell time charging appliances, e.g., residential, workplace, and fleet charging. Long dwell time charging creates more predictable loads, which can be mobilized and actively managed. Conversely, DC fast charging or opportunity charging does not appear to be a good candidate for FDAS given that the EV driver is looking to charge as fast as possible and continue on their way. As Assembly Bill 2061 emphasized "increasing consumer confidence in electric vehicle convenience and accessibility depends on robust, publicly available charging stations" and "they also need to be highly reliable so that consumers can depend on them no matter where they are."<sup>1</sup> A reliable fast charging experience is a key component to widespread EV adoption for light-, medium-, and heavy-duty EVs. Therefore, we recommend the CEC consider the needs of the EV driver in each use case when designing the FDAS.

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

Kind regards,

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

Kristian Corby, Deputy Executive Director  
California Electric Transportation Coalition

---

<sup>1</sup> AB 2061, Ting. Transportation electrification: electric vehicle charging infrastructure (2022), available at [https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill\\_id=202120220AB2061](https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=202120220AB2061).