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Comment Received From: Rebecca Shelby

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FCA and Ford Comments on Electric Vehicle Charger Incentive Projects

Additional submitted attachment is included below.





California Energy Commission Docket Unit, MS-4 1516 Ninth Street Sacramento, CA 95814

Re: Docket # 17-EVI-01

Project Title: Block Grant for Electric Vehicle Charger Incentive Projects

Comments submitted by: Fiat Chrysler Automobiles and Ford Motor Company

Fiat Chrysler Automobiles (FCA) and Ford Motor Company (Ford) appreciate this opportunity to provide comment on the California Energy Commission (CEC) requirements for implementation of the California Electric Vehicle Infrastructure Project (CALeVIP). Automakers are making the transition to electrified vehicles which will benefit both our customers and the environment. In order to realize this future, substantial challenges must be overcome including a critical barrier to adoption, a shortfall in publically available EV charging¹.

FCA and Ford appreciate the efforts CEC is taking to address this barrier by offering opportunities to deploy additional charging infrastructure in the state of California. While DC Fast Charging (DCFC) is essential for long-distance travel, this is still a poor model for every day EV charging and usage. Plugging-in while a vehicle is parked at work or destination using a Level 2 AC charger is a more ideal and efficient method for charging the vehicle battery. Therefore, the CEC should include as part of the CALeVIP program installation of Level 2 public chargers.

In addition, FCA and Ford recommend the CEC follow the recommendations of the California Public Utilities Commission's (CPUC) upcoming report from the Vehicle-Grid Integration Communication Protocol Working Group. FCA and Ford were active members in the CPUC working group which determined that there are many other methods and technologies for vehicle-to-grid communications. For this reason, and to avoid hindering future technology innovation, we do not support mandating any particular communication standard at the charging station - including ISO/IEC 15118.

Thank you for consideration of these comments, and if you have any additional questions, please contact us at the information below.

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¹ US DOE. National Plug-In Electric Vehicle Infrastructure Analysis (https://www.nrel.gov/docs/fy17osti/69031.pdf).