

**DOCKETED**

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*Comment Received From: Plug In America*  
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**Plug In America Comments on Future Equipment Requirements for  
CALeVIP**

Please see attached document for comments from Plug In America.  
(There was an internet outage which caused our filing delay)

*Additional submitted attachment is included below.*



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December 13, 2019

California Energy Commission  
1516 Ninth Street  
Sacramento, CA 95814-5512

VIA ELECTRONIC FILING

**Re: Comments on Future Equipment Requirement for CALeVIP**

Plug In America welcomes the opportunity to file these comments based on the Staff Technical Workshop held on November 18, 2019. PIA strongly supports the major goals of the CALeVIP program focusing on deploying as much EV infrastructure as possible enabling the widest access to EV drivers.

We have three major comments:

- 1) In order to provide true open access for EV drivers, it is imperative that the CEC notify sites about ARB's EVSE regulations and the timing for their implementation. As new CALeVIP regions roll out, the program's timing requirements will start to overlap with these regulations and all EVSEs funded and installed with the program should be fully compliant including chip card readers for credit, debit, and prepaid cards. As another program consideration, the CEC could incentive early implementation for the regulation, expanding access more rapidly for drivers.
- 2) We agree with our colleagues from Siemens, GreenLots, and other major manufacturers that any equipment installed with CALeVIP funding should be required to implement major interoperability and compatibility standards including OCPP (OCPP 1.6 JSON which is already accepted world-wide as a defacto standard) and ISO 15118 (as it becomes more widely available in vehicles). With ISO 15118, the implementation should be in addition to other baseline payment methods specified by ARB rather than the only method for access.
- 3) Finally, we believe that the CALeVIP program should consider possible alternatives to fully networked chargers (eg in MUDs, or shared configurations) and use cost-effectiveness as one of the key considerations for future program rollouts. This would help further expand deployment of lower-cost EVSE hardware and increase the number of installed charging stations.

We appreciate your consideration of our recommendations as you further refine the CALeVIP program. We would be happy to discuss any these ideas at length with staff.

Sincerely,

A handwritten signature in blue ink, appearing to read "Jay Friedland".

Jay Friedland  
Senior Policy Advisor, Plug In America