

**DOCKETED**

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

Attached please find revised comments from Plug In America, clarifying our position on ISO 15118 charging requirements.

Thank you!

*Additional submitted attachment is included below.*



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December 23, 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 amended 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 four 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 OCPP (OCPP 1.6 JSON which is already accepted world-wide as a defacto standard).
- 3) ISO 15118 will be a potentially viable standard in the future *after* it becomes more widely available in vehicles. With any ISO 15118 implementation in EVSE, it should be in addition to other baseline payment methods specified by ARB rather than the only method for access. We agree with CaLETc's letter and the findings of CEC Staff from the VGI working group, which recommends but does not require ISO 15118 as a protocol.
- 4) 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