

DOCKETED

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CalETC's Comments on ViGIL Workshop

Additional submitted attachment is included below.

May 27, 2020

California Energy Commission
Docket Unit, MS-4
Re: Docket No. 19-TRAN-02
1516 Ninth Street
Sacramento, CA 95814
docket@energy.ca.gov

Re: Workshop on Vehicle-Grid-Innovation Lab (ViGIL)

The California Electric Transportation Coalition (CalEETC) appreciates the opportunity to provide feedback on the California Energy Commission's (CEC's) staff proposal for ViGIL, a California-based testing lab for electric vehicle service equipment (EVSE) as discussed at the May 13, 2020, workshop. We strongly support the efforts of the CEC to promote the adoption of zero-emission vehicles (ZEVs) and equipment. To drive adoption of plug-in electric vehicles and meet California's electric vehicle targets, we need to drastically increase the amount of publicly accessible, easy-to-use charging stations.

Proposed ViGIL (testing lab) for proposed CALeVIP grant eligibility requirements.

The proposal for a California-based testing lab in the ViGIL presentation is an interesting concept, but CalEETC requests additional clarification on this matter. Further guidance on the following questions would be helpful:

- Is the proposed California ViGIL lab meant to augment the existing Nationally Recognized Testing Labs (NRTLs)?
- Will the NRTLs be willing to accept and certify the testing work of this new CA ViGIL lab? Many parties and Authorities Having Jurisdiction (AHJs) are required to use EVSE certified by NRTLs, so could the CA ViGIL lab be used in these instances?
- In order to streamline eligibility for their programs (e.g. charging station rebates), utilities are setting up a national 3rd party certification process, so would the ViGIL proposal duplicate this effort?

In consideration of the issues raised by the questions above, we provide tentative recommendations:

Our initial thinking is that the new ViGIL testing requirements for CALeVIP be optional and that stakeholders can use the existing NRTLs that are already doing testing. Stakeholders should not be required to have testing done twice—by the new California lab and an NRTL—because firms that sell products nationally want testing solutions that work nationwide and not a patchwork of testing requirements. Stakeholders should not be required to use a single lab because it seems likely that a single testing lab probably will not have the right skill sets for IT-type testing of software and physical testing of connectors, and not having a single lab helps prevent bottlenecks, which slow EVSE development and deployment.

Ideally, the ViGIL lab is a place where car and truck manufacturers and charging station suppliers and network providers can do voluntary testing to help with product development, since few similar labs exist for this purpose. This approach would help speed products to market.

We agree with the proposal in the November CALeVIP workshop presentation that required EVSE standards be approved by an NRTL to be eligible for CALeVIP grant funding.

Finally, we suggest a new California laboratory (ViGIL) have direct input from both automakers, charging network providers and utilities through a guidance council.

Thank you for your consideration of our comments. Please do not hesitate to contact me at (916) 551-1943 or kristian@caletc.com should you have any questions.

Sincerely,
California Electric Transportation Coalition



Kristian Corby
Deputy Executive Director