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Silicon Valley Clean Energy Comments on Proposed Change to DCFC CCS and CHAdeMO Connectors Requirement

Silicon Valley Clean Energy (SVCE) respectfully submits these comments on the California Energy Commission's (CEC) proposed design change to the per-charger CCS and CHAdeMO connector requirement at each site funded by the California Electric Vehicle Incentive Project (CALeVIP).

SVCE strongly supports the practice of adjusting CALeVIP equipment and eligibility requirements to respond to changing market conditions. Program requirements should be developed, established, and updated in a timely, ongoing fashion to ensure that deployed assets will remain as relevant as possible to the ever-changing makeup of the statewide vehicle fleet.

One critical recent development is Nissan's announcement that its new EV, the Nissan Ariya, will utilize a CCS connector instead of a CHAdeMO. While many existing EVs will continue to require CHAdeMO ports, this announcement indicates that the overall fleet makeup may begin shifting further towards CCS-equipped vehicles.

SVCE understands that the CEC proposal is to change DCFC requirements in CALeVIP from the current requirement that every charger must have both a CCS and CHAdeMO connector to a site-based approach where each location must have a minimum of one CHAdeMO connector and the remainder can be CCS connectors. This appears to allow for greater flexibility and potential cost-effectiveness in DCFC projects, while letting the market and installers decide how best to maximize utilization through the split of CCS and CHAdeMO ports at a site. The minimum of one CHAdeMO connector would then protect access for legacy EVs even as new EVs fully transition to CCS. For these reasons, SVCE supports the concept behind the CEC's proposal.

However, SVCE is not able to conclusively recommend whether to make this change, or how quickly to enact it, based on data it has reviewed. The CEC has access to relevant data through state databases and previous CALeVIP projects that should be used to guide these decisions. Here are key questions that SVCE has identified:

• How feasible/difficult is it to retrofit a CHAdeMO port to a CCS port? Can this be done without needing to entirely replace the existing charging station? What are the associated costs?

• What is the current utilization of CHAdeMO ports as compared to CCS ports?

• What is the expected lifetime of the DCFC installed through CALeVIP, and how does this compare to projections of the EV fleet? What is the expected split between CCS-equipped and CHAdeMO-equipped EVs over that lifetime? What does this mean for expected utilization of each type of port?

SVCE believes that, if the answers to these questions indicate that large numbers of CHAdeMO ports installed through CALeVIP in the coming years will be poorly-utilized and infeasible to update, then the CEC should consider enacting this proposed change for current, upcoming, and future projects. Conversely, if projected CHAdeMO demand (primarily from legacy EVs) remains high over the lifetime of the DCFC equipment, then this proposed change could reasonably be revisited or delayed. SVCE strongly urges the CEC to make a data-based decision using its existing information and market projections, and then to act on those findings as rapidly as possible. SVCE suspects that this data may indicate a need to quickly implement the change proposed by the CEC.

Finally, SVCE believes that the CEC and its funding partners would be able to identify workable approaches for implementing the proposed change at almost any time during a CALeVIP project lifecycle. One such approach for an already-launched CALeVIP region might be to allow funds-reserved projects to choose what equipment eligibility they'd like to follow: the original (one CCS and one CHAdeMO port per charger) or the CEC's newly proposed approach (only one CHAdeMO port required at the site). This flexibility would allow for more CCS ports to be deployed without disadvantaging applicants who have already purchased equipment and made commitments based on the original program rules. However, since local partner participation and funds may have been approved based on the original equipment eligibility, these local funding partners will need to be involved in the final decision on whether to allow additional flexibility for their region or keep to the original eligibility requirements.