

DOCKETED

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**Wallbox Comments on Proposed Charging Interoperability and
Collaboration Yard Funding Concept**

Additional submitted attachment is included below.

May 24, 2023

Patricia Monahan
Commissioner
California Energy Commission
1516 Ninth Street
Sacramento, CA 95814

RE: Wallbox Comments on the CEC's Charging Interoperability and Collaboration Yard Funding Concept

Dear Commissioner Monahan and Staff:

Wallbox thanks the California Energy Commission (CEC) for its continued leadership in transportation electrification and opportunity to comment on the latest CEC project concept: Charging Interoperability and Collaboration Yard Funding Concept (Charge Yard Concept).

For context, Wallbox is a leading global EV supply equipment (EVSE) manufacturer and energy management solutions company. Based in Barcelona, with North American headquarters in Mountain View, California, Wallbox has sold over 460,000 chargers in more than 113 countries to date. Wallbox aims to address the challenges of climate and energy management via state-of-the-art EV charging solutions, including AC level 2 chargers, DC fast chargers, and bidirectional charging technologies.

Wallbox supports both the objective and approach of the Charge Yard concept. As a leading manufacturer of EVSE, Wallbox knows firsthand complexities and challenges of hardware and software interoperability testing for electric vehicle supply equipment (EVSE). Streamlined testing that enhances rollout of secure, convenient, and reliable charging infrastructure requires continued coordination amongst charging equipment manufacturers, network providers, and vehicle manufacturers. The Charge Yard concept would benefit all stakeholders – including end customers – by increasing interoperability testing efficiency, lowering costs of testing, and speeding up certifications.

As the CEC contemplates final program design and whether to pursue the solicitation, Wallbox respectfully submits the following recommendations to maximize the Charge Yard's success:

- **Wallbox supports the Charge Yard plan's objectives and overall approach:** Interoperability and standards testing can be a costly, iterative process that presents significant market bottlenecks as the industry takes huge steps to scale; these barriers are even more challenging for smaller companies and companies working to bring new, innovative products to the market. Wallbox supports the CEC's goal of minimizing these barriers and providing services for - including the CharIN CCS Extended standard and the multiple ISO 15118 standards. Wallbox believes that Charge Yard should be a project squarely focused on expediting interoperability through coordination and testing of EVSE

with automakers, not a body that creates new standards or makes recommendations to changing standards.

- **Use standardized interoperability testing tools:** While there are an increasing number of interoperability standards and testing events, the reality is that automakers and EVSE manufacturers are commonly implementing critical protocols like ISO 15118 independently. Coalescing around the ISO 15118 standard is critical, and it is equally important that the implementation of these standards are congruent between OEMs and EVSE manufacturers. The CEC can ensure standardized implementation of ISO 15118 and reduce overall permutations of testing necessary by utilizing a standardized set of testing tools.
- **To properly accommodate bidirectional charging, lower the minimum EVSE power rating requirements:** Wallbox supports Charge Yard's proposal to support Vehicle to Everything (V2X) technologies. While the Charge Yard Concept has tentatively recommended a 50 kW minimum for EVSE participation, that power rating would preclude any vehicle-to-home charging solutions, a stated use case of interest to the CEC. Bidirectional chargers are still a nascent technology, with use cases and commercial technologies still in development. While a 50 kW minimum power rating may be appropriate for DC fast charging equipment, Wallbox recommends that the CEC establish 11.5 kW as a minimum power rating for bidirectional charging. By implementing this minimum power rating, the greatest multitude of bidirectional EVSE will be able to participate in the program, ensuring the largest amount of testing and interoperability between automakers and EVSE manufacturers.
- **Wallbox supports the offering of optional offering of certification services:** Both California and federal funding programs (i.e. NEVI) are increasingly requiring ISO 15118 capabilities as a prerequisite for equipment eligibility. While current requirements are limited to self attestation and hardware readiness, the CEC can play a supportive role in the certification process by offering this certification service for a fee.
- **To maximize participation in the Charge Yard, make sharing data for publishing optional:** Wallbox recognizes the potential value of information from anonymized root cause and error data reports; however, given the limited number of actors in the industry (and potentially even smaller number of organizations participating in the Charge Yard), Wallbox believes that publishing this data – however anonymized it may be – may detract participation in the Charge Yard, thus limiting its overall potential.

Conclusion

Thank you again for your consideration of these recommendations. By serving as an organizing force for the stakeholders, the CEC can continue its role in driving towards equitable, reliable, and convenient charging infrastructure deployment across the state. Wallbox looks forward to partnering with the future program implementer to help deliver the best charging experiences for Californians.

Sincerely,



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