

**DOCKETED**

<b>Docket Number:</b>	22-EVI-04
<b>Project Title:</b>	Electric Vehicle Charging Infrastructure Reliability
<b>TN #:</b>	253621
<b>Document Title:</b>	PowerFlex Comments_Field Testing Protocol
<b>Description:</b>	N/A
<b>Filer:</b>	System
<b>Organization:</b>	PowerFlex/Jonathan Hart
<b>Submitter Role:</b>	Public
<b>Submission Date:</b>	12/14/2023 2:00:23 PM
<b>Docketed Date:</b>	12/14/2023

*Comment Received From: Jonathan Hart  
Submitted On: 12/14/2023  
Docket Number: 22-EVI-04*

**PowerFlex Comments\_Field Testing Protocol**

*Additional submitted attachment is included below.*



December 14, 2023

California Energy Commission  
Docket Unit, MS-4  
715 P Street  
Sacramento, CA 95814

**Re: Docket No. 22-EVI-04—PowerFlex Comments on November 30, 2023 EV Charger Field Testing Protocol Workshop**

California Energy Commissioners and Staff:

PowerFlex appreciates the opportunity to comment on the California Energy Commission's (Commission's) November 30, 2023 Electric Vehicle (EV) Charger Field Testing Protocol workshop. PowerFlex supports the Commission's efforts to create the reliability reporting and field testing protocol through open dialogue with industry. Accordingly, PowerFlex provides comments on the following aspects of the workshop and the proposed field testing protocol:

- Encouraging power sharing and/or Automated Load Management (ALM)
- Anonymized Data
- Additional working groups

**Encouraging power sharing and/or Automated Load Management (ALM)**

During the November 30 workshop, a question was posed on how to verify charging sessions using power sharing and/or ALM. As a provider of ALM for each EV supply equipment (EVSE) at every one of our sites, PowerFlex appreciates the Commission's consideration of load management in the field testing protocol. ALM has already been shown to reduce the cost of installing EVSE by avoiding and reducing the amount of infrastructure needed to support EVSE,<sup>1</sup> and several studies,<sup>2</sup> including the Commission's recent Electric Vehicle Infrastructure Assessment Staff Report,<sup>3</sup> point to ALM and EVSE load management as tools that can significantly reduce infrastructure costs in achieving the State's transportation electrification goals. Given the potential for significant cost savings with ALM, PowerFlex recommends that the field testing protocol encourage the use of load management and should not classify charging sessions that manage load as "unsuccessful." PowerFlex is concerned that a charging session that uses load management on the EV charging could be classified as "unsuccessful" if the vehicle does not immediately or always receive the full rated power capacity of the EVSE. Rather, the field testing protocol should note which sessions used load management and, if there are not other failures in the charging session, should classify these as successful charging sessions. By so doing, the field testing protocol would not discourage sites from using load management.

---

<sup>1</sup> *Pacific Gas and Electric Company Electric Vehicle Charge 2 Prepared Testimony*, pages 2-9 – 2-10, October 26, 2021.

<sup>2</sup> *Distribution Grid Electrification Model Study and Report*, Public Advocates Office, August 2023. *Electrification Impacts Study Part 1*, Kevala (on behalf of the CPUC), May 2023.

<sup>3</sup> *Assembly Bill 2127 Electric Vehicle Infrastructure Assessment Staff Report*, California Energy Commission, ages 83-84, August 2023. <https://www.energy.ca.gov/publications/2023/second-assembly-bill-ab-2127-electric-vehicle-charging-infrastructure-assessment>



### **Anonymized Data**

It was unclear to PowerFlex during the workshop whether vehicle charging provider data would be anonymized in any public-facing reports. PowerFlex recommends that public reports using the field test data be anonymous so no single charging providers are singled out in the reports. PowerFlex believes that publishing the EV charging providers names associated with their data could inaccurately portray the services or value that a charging provider offers to drivers. Additional unintended consequences are likely if this data is not anonymized. Thus, PowerFlex suggests that the CEC anonymize EV charging provider data in any public reports using the field test data.

### **Additional Working Groups**

PowerFlex asks that the Commission host additional working group meetings to develop the field testing protocol. While the November 30 workshop was productive, additional input from a wider range of stakeholders would result in a more vetted field testing protocol. Given that the data from the field testing is likely to impact future Commission regulations regarding EVSE, PowerFlex requests that additional working group sessions be held to more fully develop and discuss the field testing protocol.

PowerFlex appreciates the opportunity to provide these comments in response to the Commission's November 30, 2023 workshop and looks forward to collaborating with the Commission on this topic in the future. Respectfully,

Raghav Murali  
Director, Policy and Government Affairs  
[Raghav.murali@powerflex.com](mailto:Raghav.murali@powerflex.com)  
PowerFlex Inc.