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CharIN Comments ISO 15118 Ready Chargers

Additional submitted attachment is included below.



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May 30, 2024

California Energy Commission
715 P Street
Sacramento, CA 95814

RE: Updated Recommendation on ISO 15118 Ready Chargers (Feb 2024), Docket No. 22-EVI-06

Dear Commissioners:

The Charging Interface Initiative (CharIN) is the largest global association focused on the electrification of all forms of transportation based on the seamless and interoperable charging experience enabled by the Combined Charging System (CCS) and the Megawatt Charging System (MCS), as well as communications standards especially between chargers and electric vehicles. CCS and MCS are the global standards for charging vehicles of all kinds, with ISO 15118 supporting them on the communications protocols. An inclusive, industrywide coalition, CharIN represents nearly 300 leading e-mobility stakeholders, from automakers to utilities, grid operators, component suppliers, and charging station developers. Nearly 75 of these members are based in North America. A complete list of members may be found on our website at www.charin.global.

CharIN appreciates the opportunity to provide comments to the California Energy Commission (CEC) regarding its Updated Recommendation on ISO 15118 Ready Chargers (February 2024), (“Updated Recommendation”).

ISO 15118 Ready Definition

As a strong supporter of open standards, CharIN appreciates the leadership the CEC has shown in promoting and evaluating the adoption of standards in chargers funded by California state grants. These requirements currently include a requirement that charger be “ISO 15118 Ready”. The Updated Recommendation provides a detailed definition of ISO 15118 Ready that includes six elements. CharIN appreciates the specificity of the definition. However, regarding point three on the definition, “Transport Layer Security (TLS) version 1.2. Support for TLS 1.3 is recommended to support cryptographic requirements in ISO 15118-20”, CharIN notes that cybersecurity requirements for updated versions of ISO 15118, as well as for SAE J3400 are still being developed. Rather than require TLS specifically, CharIN recommends that the CEC promote whatever is finally adopted in the updated published ISO 15118-2 standard – which is expected later this year. It is also critical that any standard promoted by the CEC consider chargers already deployed and allow for the grandfathering of such chargers.

Conformance Testing

CharIN supports conformance testing to ensure standards implementations are consistent with the published standards and test cases. CharIN also supports the CEC's position that both third-party and self-testing be allowed. Conformance testing by third parties can be very expensive and should be kept as an option and not a requirement.

ISO 15118-20 Ready and ISO 15118-20 Light

CharIN generally supports the CEC's recommendations regarding ISO 15118-20 ready and 15118-20 light. However, as noted above, any standards promoted by the CEC should reflect the final published standards expected later this year. In addition, at this stage of the market, the CEC should keep an open mind regarding 15118-20 Light and avoid characterizing it as a "bridge." Depending on the evolution of the standard and of the market, 15118-20 Light may represent a long-term solution in various situations. The cybersecurity requirements are also evolving, including the potential for federal updates, so it is imperative that the CEC allow for flexibility and market-driven solutions.

Powerline Communication Chipset Updates

CharIN agrees with the recommendation that charging providers work with their powerline communication chipset supplier – as they are already doing – to access updates that may aid product development and ISO 15118 implementation.

Availability of Open Source Software Stacks

CharIN is familiar with the development of EVerest and has been tracking its progress. While EVerest has promise as a potential solution, the CEC should not mandate its use or adoption. Instead, charging providers should have the flexibility to select the solution that best meets their needs.

Conclusion

CharIN appreciates the opportunity to provide feedback to the CEC regarding the Updated Recommendation. Generally, CharIN supports an approach that ensures flexibility and market-driven solutions within a framework where ISO 15118 is promoted.

Sincerely,



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Executive Director

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