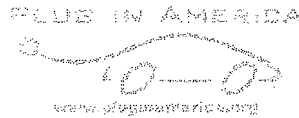


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April 7, 2009

Michael Smith
Fuels and Transportation Division
California Energy Commission
1516 Ninth Street
Sacramento, CA 95814

Dear Mr. Smith,

On behalf of Plug In America, and as a follow up to my public comments to the Final Draft Investment Plan on Monday April 6th, we promised to provide a more detailed written clarification of our position regarding implementation of standards and certifications for plug-in electric vehicles.

Plug In America believes now is the time for a serious commitment to plug-in vehicle infrastructure standards. Work by the Automotive Initiative of SAE International (SAE) on the J1772 standard is nearing agreement on Level I charging protocols in the next few weeks, with Level II not far behind.

There is no need for CEC to postpone funding the upgrading of existing charging stations due to a lack of standards. The majority of automobile companies have stated that their plugs will work in household 120 VAC outlets as well as the new J1772 connector. There is no issue. There is no debate. Consumers awaiting EV/PHEV look forward to the simplicity of plugging in at night, at home. Utilities presently have the capacity to inexpensively deliver power off-peak for numbers of plug-in vehicles far in excess of the anticipated rollout. We believe that roughly 80% of drivers will charge this way.

AB118 funding from the CEC can help accelerate the commercialization of standards for rapid charging (SAE J1772 Level II and Level III). For this reason, Plug In America is recommending that \$750,000 of funding be provided in the Investment Plan in the Standards and Certification section (p.43) to help in the accelerated adoption of plug-in electric vehicle standards for Level II and III.

Plug In America's Infrastructure Committee two weeks ago convened a high level meeting of stakeholders attended by the CEOs and managers of the majority of charging infrastructure companies such as Coulomb, Better Place, eTec, and Shorepower, as well as Tesla, which estimates that it will have over 1000 vehicles on the road by the end of 2009. As you know, these companies are poised to install and update charging stations throughout the state, possibly with AB 118 matching funds. At this meeting, Plug In America was able to drive a consensus agreement where the companies unanimously stated their commitment to standards that would ensure interoperability for consumers - following the principle that every plug-in car should be able to charge at every public charger, thus avoiding the past syndrome of incompatibility. Based on this meeting, the stakeholders identified several recommendations outlined below, which CEC can help implement with AB 118 funding.

Continues

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SPECIFIC RECOMMENDATIONS:

A) Plug In America suggests that CEC add funding support for accelerating SAE J1772 charging standards to its Investment Plan in the Standards and Certifications section (p.43).

While the standard will be approved by SAE (expected a few weeks), it will still be necessary for individual companies or a public agency to fund the NRE (non-recurring engineering) tooling charges for a high current Level II connector – estimated to be about \$500,000. Plug In America proposes that the CEC fund the NRE tooling charges. Without this funding, it is likely that each implementation of the connector will remain proprietary. If the CEC were to provide the funding for the NRE, it would greatly accelerate availability for commercial manufacture. CEC funding would allow for J1772 to become a truly open standard. Consumers would benefit the most, and this is a very appropriate path for AB118 funding.

B) While Plug In America believes that publicly-funded charging infrastructure should either be free or reflect the affordable cost of electricity as the low cost fuel, we also support the creation of a clearinghouse for charging infrastructure payment systems. Similar to how the FastTrack system enables drivers to cross multiple Bay Area bridges, such technology can be used in plug-in electric vehicle charging stations. We believe a plug-in car must be able to charge at any site without membership in a private network. The CEC can contribute by funding the development of mechanisms and protocols for uniform payment, similar to bank ATM systems. CEC funding can enable a database registry and help find and fund an independent third party to monitor and provide a payment scheme.

In conclusion, Plug In America believes that the CEC can play a vital role in the rollout of plug-in vehicles by accelerating commercialization of the higher-current J 1772 connector by covering the nonrecurring engineering costs, and helping to support an interoperable payment system that would enhance consumer use.

Thank you for your time,


Jeanne Trombly

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