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11-ALT-1

DATE MAR 16 2012

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March 16, 2012

Commissioner Carla Peterman
California Energy Commission
Docket Office, MS-4
1516 Ninth Street
Sacramento, CA 95814-5512

Re.: 11-ALT-1: 2012-2013 Investment Plan – Electric Vehicle Charging Infrastructure

Dear Commissioner Peterman:

As a leading car company with significant investments in fostering alternative fuel and vehicle technology, the BMW Group appreciates the opportunity to comment on the California Energy Commission's (CEC) staff draft report, which outlines various programs, policies and goals aimed at spurring the deployment of cleaner fuels and cars. These programs will not only help the state meet ambitious climate change goals established under AB 32, but will also help diversify the state's transportation infrastructure and create new economies.

In this regard, more efficient vehicle charging systems represent one of the most promising technologies that will help create the state's new transportation infrastructure – primarily the deployment of plug-in electric vehicles (PEVs). PEV technology has significantly improved over the years, and as a result consumers are more aware of PEVs and curious about how they can fit a PEV into their lifestyles. At the same time, while more efficient charging systems has created a tremendous opportunity to increase the deployment of PEVs, there remains a challenge of having a universally accepted charging system that will benefit both consumers and the industry.

The BMW Group believes there is an answer to this challenge. We are pleased to work with Audi, Daimler, Chrysler, Ford, General Motors (GM), Porsche, and VW on a DC charging standard to support the goal of harmonizing EV charging technology through the development of a globally accepted combined charging system. This system is currently being standardized in SAE and ICE/ISO and is known as the Combo Charger. The SAE Standardization J1772 is slated to be completed by mid 2012. Research on the first prototypes proved that the Combined charging system works. Moreover, the success of Level 1 and Level 2 (for 220V in the U. S.) demonstrated that standardization will increase the adoption of EVs and will lessen consumer angst. A combined charging system that harmonizes the technology has many benefits, including:

- Simplifying infrastructure planning and minimizing cost;
- Increases consumer confidence for charging convenience to plan for extended driving needs;
- Provides a consistent standard with identical electrical systems, charge controllers, safety mechanisms, and common sheet metal interface dimensions. In addition to, simplifying

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workforce training and development on mechanics, permitting, installation, and inspection of charging units;

- Simplifying the complexity of multi-unit dwellings. For PEV owners who live in urban areas such as Los Angeles and San Francisco, a Combined charging system will be ideal to address their charging needs when having to relocate. In this instance, PEV owners will not have to agonize if their new location will have the proper charging unit for their car (s); and
- Combined charging system is backwards compatible to already existing AC Level2 infrastructure.

The BMW Group strongly recommends the installation of combined charging in accordance with the SAE Standard in 2012 or alternatively, installing charging units that will support the Combined Charger and the CHAdeMO Charging with two separate connectors at one charger. We believe that a Combo Charger will accelerate the adoption of PEVs in the California market.

Thank you for taking into consideration our comments on the need to streamline and simplify charging challenges for consumers. Again, we appreciate the opportunity to submit comments on the Investment Plan and we look forward to working with staff. Please feel free to call or email me should you have any questions or need clarification on this topic. I can be reach at 916-476-5688 or email andreas.klugescheid@bmwna.com.

Regards,

A handwritten signature in dark ink, appearing to read 'Andreas Klugescheid', written in a cursive style.

Andreas Klugescheid
Vice President Governmental Affairs
BMW Group Representative Office California