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Energy Star Program Office
U.S. Environmental Protection Agency
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ChargePoint Comments to EPA on ENERGY STAR EV Supply Equipment Version 1.1 Specification and Test Method

ChargePoint appreciates the opportunity to provide initial comments to the United States Environmental Protection Agency (EPA) on the proposed ENERGY STAR certification for DC fast charging stations (DCFC). ChargePoint participated in the June 4, 2018 discussion guide webinar and previously contributed to the development of the ENERGY STAR Version 1.0 specification for Level 1 and 2 electric vehicle (EV) charging stations.

ChargePoint is the world's leading electric vehicle charging network, with charging solutions in every category EV drivers charge; at home, work, around town, and on the road. With more than 50,000 independently-owned public and semi-public charging spots and thousands of customers (businesses, cities, agencies and service providers), ChargePoint is the only charging technology company on the market that designs, develops, and manufactures hardware and software solutions across every use case.

ChargePoint's comments focus on two key considerations to inform EPA's process going forward. First, ChargePoint notes the range of DCFC technologies, capacities, and use cases, all of which are rapidly evolving among current market offerings. Second, ChargePoint recommends EPA hold stakeholder meetings prior to finalization of a draft specification. The wide array of stakeholders and associated solutions leads to a robust, open discussion through the development of specification.

1. DCFC technology is unique and the goals of ENERGY STAR must be balanced with the needs of drivers.

In the June 4 webinar, EPA accurately stated that while some elements of the EVSE Version 1.0 specification may apply to a prospective DCFC specification, many elements of Version 1.1 must only apply to the particular and specific qualities of DCFC stations. DCFC systems and features are significantly more complicated than Level 2 stations, both in terms of design and engineering, as well as the various components required to achieve higher powered charging. For example, the use of cooled cables, an emerging feature of high speed DCFC, increases energy use in a way that is necessary to improve the usability and performance of the station. ChargePoint submits that in development of the specification, it will be important to balance the goals of ENERGY STAR with the technology needs that make DCFC best for drivers.

The DCFC market is on a precipice of technology innovation, with many companies announcing fast chargers expected to enter the market this year with capacities of 400kW and greater. Automakers are selling vehicles with longer ranges, and recently announced models are capable of receiving higher rates

of charging. Additionally, several sources of public funding are now available for DCFC, including Volkswagen Settlement Appendix D NOx Mitigation funds, state grant programs, and utility EV charging programs. An increase in EV adoption by Transportation Network Companies like Uber and Lyft, as well as state goals to encourage EV adoption by all drivers, will also substantially increase demand for more DCFC installed in the coming years.

ChargePoint supports the development of an ENERGY STAR certification for DCFC, but encourages EPA to consider this technology separately and apart from the specification for L2.

2. EPA should hold stakeholder meetings prior to finalizing a draft specification.

The timeline for discussion provided at the June 4 webinar indicated that EPA intends to release a draft specification and hold a stakeholder meeting at the same step in the development process. Instead, ChargePoint strongly encourages EPA to hold regular stakeholder meetings *before* finalizing a specification for review. More specifically, ChargePoint suggests EPA hold regular biweekly or monthly meetings with stakeholders to discuss the elements of the specification, the technology roadmap expected for DCFC, and the unique issues associated with this technology. ChargePoint and other charging system vendors in the industry (including competitors) have substantial insights into future vehicle needs, charging trends, and manufacturing plans, and greater input to EPA from market participants would produce a more comprehensive specification.

A process with limited advance coordination with stakeholders may delay the review of the draft specification and unduly restrict the products that may qualify under this specification in the future.

ChargePoint was the first charging station company to qualify for ENERGY STAR certification for Level 2 charging. While this achievement was significant, greater choice in products qualified under EVSE Version 1.0 and eventually EVSE Version 1.1 will improve and strengthen the market for customers. For that reason, we encourage EPA to seek early, broad-based stakeholder participation in the development of the specification.

Thank you for your consideration of our comments. ChargePoint looks forward to continuing to work with EPA staff on development of EVSE Version 1.1.

Sincerely,



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