

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460



OFFICE OF
AIR AND RADIATION

October 6, 2015

Dear Electric Vehicle Supply Equipment Brand Owner or Other Interested Party:

The U.S. Environmental Protection Agency (EPA) welcomes your input on the following Draft 2 ENERGY STAR Test Method for Electric Vehicle Supply Equipment (EVSE). This letter outlines changes made to the test method in response to stakeholder feedback on Draft 1, seeks specific feedback on Draft 2, and calls for data assembly to begin to inform the specification setting process.

The following changes to the test method include:

- **Scope and Definitions:** In response to stakeholder feedback, EPA has provided clarification regarding definitions, test boundary, scope of products, testing products without a SAE J1772 coupler, and testing higher-current EVSE
- **Automatic Brightness Control:** EPA has provided additional clarification on testing products with Automatic Brightness Control (ABC) in a variety of bright and dim illuminance conditions. Also, EVSE shall be tested in the default, as-shipped condition.
- **Auto-Power Down:** To account for the time required to transition from higher power (On or Active) modes to low power (Idle or Partial On) modes, EPA added an auto-power down (APD) test. APD has the potential to deliver additional savings where products in Idle or Partial On Modes typically consume comparatively less energy than in On or Active modes.
- **Test Set-Up:** In response to stakeholder recommendations to use different cable lengths for testing EVSE (e.g., default provided by manufacturer, longest sold with the EVSE, etc.), to ensure the most repeatable results, EPA has revised the test setup instructions to require measurements directly at the input power connection inside the EVSE for products that do not ship with an input power cord. Also per stakeholder feedback, EPA proposes removing the measurement of ground current and control pilot from test requirements.

EPA requests input on the following topics to inform the subsequent draft of the test method and forthcoming Draft 1 specification:

- Residential and commercial applications: Do specific features or functions alter the energy consumption of the EVSE when used in a residential setting versus a commercial setting?
- Connected Functionality: EPA sees value in highlighting connected functionality in ENERGY STAR EVSE, where such capability exists in products. EPA has already developed criteria for numerous existing ENERGY STAR specifications, such as pool pumps and a range of appliances, and is developing such criteria in the new ENERGY STAR specification for connected thermostats. EPA is interested in developing tailored criteria for EVSE and any necessary test method for this functionality. A placeholder for such a test has been included in the Draft 2 Test Method as have initial thoughts on key elements and questions for stakeholder comment.

Data Assembly

The Agency has not proposed performance levels for EVSE at this time but **is assembling data to inform the specification setting process**. Using the enclosed form, manufacturers are invited to provide test data for their current models for inclusion in the dataset according to the Draft 2 Test Method. EPA considers that the Draft 2 Test Method is sufficiently developed at this stage to test the energy efficiency of EVSE within the proposed scope of products. EPA believes that additional changes to the test method in response to stakeholder feedback to this Draft 2 will be minor, such that any data collected now will be valid for the purposes of informing the specification development process. Once EVSE test data is available, EPA will use the data to develop a first draft of the specification's energy efficiency requirements. EPA anticipates releasing a Draft 1 EVSE Version 1.0 specification for stakeholder review and comment by the end of this year or in early 2016. For more information on EPA's process for developing ENERGY STAR specifications, please see the attached document.

Upcoming Webinar

The exchange of ideas and information between EPA, industry, and other interested parties is critical to the success of ENERGY STAR. Stakeholder participation is key to the ENERGY STAR specification development process and is strongly encouraged. **EPA plans to hold a webinar on October 21, 2015 from 1:00pm-4:00pm Eastern Time** to discuss the Draft 2 test method. Please [register](#) for the meeting prior to attending.

Submitting Data and Feedback

Stakeholders are encouraged to submit any data and feedback to EPA on the Draft 2 Test Method for ENERGY STAR EVSE no later than Tuesday, November 17, 2015. Please note that for data assembly purposes, data submitted to EPA is not required to undergo third party certification. Comments and data should both be submitted to ElectricVehicleSupplyEquipment@energystar.gov. All documents related to this specification development are posted on the [ENERGY STAR EVSE product development page](#).

If you have any questions about the ENERGY STAR program and this effort in particular, please contact me at Verena Radulovic, EPA, at Radulovic.Verena@epa.gov and (202) 343-9845 or Matt Malinowski, ICF International, at Matt.Malinowski@icfi.com and (202) 862-2693.

Thank you for your support of ENERGY STAR. I look forward to continuing to work with you during the specification development process.

Sincerely,

A handwritten signature in cursive script that reads "Verena Radulovic".

Verena Radulovic, Product Manager

Enclosures:

Draft 2 ENERGY STAR Test Method for EVSE

Data Assembly Form

Specification Development Process Description

Stakeholder Comment Response Document