

EEI Comments to EPA on EVSE Draft 2 Version 1.0 Specification for Electric Vehicle Supply Equipment (EVSE) and Draft 3 Test Method

Sent via e-mail to EVSE@energystar.gov and Radulovic.Verena@epa.gov

Ms. Radulovic,

The Edison Electric Institute (EEI) appreciates the opportunity to submit comments on the Draft 2 Version 1.0 Specification for EVSE and Final Draft Test Method (August 2016), and the September 15, 2016, webinar slides addressing these updated documents.

EEI is the association that represents all U.S. investor-owned electric companies. Our members provide electricity for 220 million Americans, operate in all 50 states and the District of Columbia, and directly employ more than 500,000 workers. With more than \$106 billion in annual capital expenditures, the electric power industry is responsible for millions of additional jobs.

The electric industry is quickly transforming itself to provide our customers clean, safe, reliable energy, and a modernized grid with more customer solutions, at affordable rates. In just 10 years, the mix of sources used to generate electricity has changed dramatically. Coal's share of total net electricity generation dropped from 50 percent in 2005 to just 33 percent in 2015.¹ In fact, one-third of all electricity generated in 2015 came from zero-emitting resources, including nuclear, wind, solar, hydropower, and other renewables. *See id.* Almost 100 percent of all non-solar renewable electricity is produced by large, utility scale generators, with utility scale, universal solar generation accounting for about 60 percent of the solar capacity in the country, at about half the cost of private, residential solar facilities.² As a result of these changes in the generation mix, as well as other environmental requirements and increased energy efficiency, the power sector has significantly decreased its greenhouse gas (GHG) emissions. At the end of 2015, the sector's GHG emissions were nearly 21 percent below 2005 levels.³ As the power sector continues to transition the fleet to a cleaner, less-emitting generation mix, electrification across a variety of sectors, including the transportation sector, will be a key driver in achieving national emission reduction goals.

The continued electrification of the country's transportation sector, in particular, is an area of great importance and one in which EEI has made specific efforts to lead by example through recent initiatives, such as the November 2014 commitment by more than 70 investor-owned

¹ See Department of Energy (DOE), *Energy Information Agency (EIA), Electric Power Monthly*, table 1.1 (August 24, 2016), <http://www.eia.gov/electricity/monthly/index.cfm>.

² See SEIA, *Solar Market Insight 2015*, <http://www.seia.org/research-resources/solar-market-insight-2015-q4>.

³ See EIA, *Monthly Energy Review* (May 2016), <http://www.eia.gov/totalenergy/data/monthly/pdf/mer.pdf>.

electric utilities to devote at least five percent of their annual fleet acquisition budgets, or approximately \$50 million annually, to the purchase of plug-in electric vehicles (PEVs) and technologies; the Employee PEV Engagement Initiative to encourage member utilities to participate in the Department of Energy's Workplace Charging Challenge and to help drive PEV adoption among utility employees; and the June 2015 private-public partnership between EEI and DOE to identify and pursue collaborative opportunities between the government and the utility industry to promote and accelerate the nationwide adoption of electric vehicles.

EPA Has Made Significant Improvements to the Test Method and Specifications in Regard to Demand Response

EEI supports the changes that EPA has made, especially in the area of demand response. The previous version of the requirements included onerous provisions. The current specification, as shown in the EPA letter of August 26, 2016, states: "EPA has clarified that only products qualifying to ENERGY STAR that wish to be designated as having connected functionality in the ENERGY STAR product finder must meet the connected criteria. Products that either currently deliver or are capable of delivering DR capability may be listed. DR capability must enable consumer override, with the acknowledgment that certain DR programs may need to limit this feature." By removing the previous mandate, the new clarification will ensure that more end-users will be able to find and purchase EVSE equipment that will be suitable for their applications.

EEI has Concerns about the Certification Requirements

EEI fully understands the rationale behind third-party certification. However, if such certification creates a significant financial burden to manufacturers, then the result may be an increase in the initial price of EVSE devices, which could limit the success of an Energy Star labeling program. EPA should closely study the financial impact of the third-party certification process to ensure that it provides the intended benefits at a cost reasonable to consumers.

EVSE Power Factor

EEI appreciates the fact that there is a power factor measurement included in the Final Draft Test Method in Section 5.4 for Operation Mode (State C) Testing. However, EPA has not added a minimum power factor requirement for any of the operational modes (off mode, idle mode, partial on mode, and operation mode).

As EEI noted in our November 17, 2015 comments, lower power factors have the potential to create added stress on the electric power generation, transmission and distribution systems. Appliances with lower power factors increase demand for power, as well as related transmission and distribution losses. Therefore, EEI remains in favor of a minimum requirement for power factor in all modes of operation. EPA has established minimum power factor requirements for other products in the Energy Star program, such as compact fluorescent lamps and LED lighting

products. Working with manufacturers, EPA should be able to develop a reasonable baseline that will not be burdensome for manufacturers and not be detrimental to utility systems (e.g., at least 70%).

Thank you for your review and consideration of our comments. Please contact Steve Rosenstock (202-508-5465, srosenstock@eei.org) if you have any questions about EEI's comments.

Respectfully submitted,

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