

EEI Comments to EPA on the Final Draft Version 1.0 ENERGY STAR EVSE Specification and Final Test Method for Electric Vehicle Supply Equipment (EVSE)

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Ms. Radulovic,

The Edison Electric Institute (EEI) appreciates the opportunity to submit comments on the Final Draft Version 1.0 ENERGY STAR EVSE Specification and Final Test Method that was published on December 13, 2016.

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 So far in 2016, the GHG emissions from the electric power sector are down by eight percent compared to 2015.⁴ 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.

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>.

⁴ See EIA, *Monthly energy Review* (Nov. 2016), http://www.eia.gov/totalenergy/data/monthly/pdf/sec12_9.pdf.

The continued electrification of the country's transportation sector 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 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 Improvements to the Test Procedure and the Final Draft Specification

Based on EEI's review, EPA has made improvements to both the test procedure and the final draft specification. In particular, EEI appreciates the examples shown on pages 8 and 11 for the wattage allowance for a 5 inch by 5 inch screen with a maximum measured luminance of 300 candelas/m².

Although EEI believes that the emphasis of the program should be geared towards Level 2 equipment, EEI supports the latest version of the specification, so that EVSE equipment that is more energy efficient can be recognized for its energy efficiency.

EPA Should Provide a Reasonable Review Period for Meaningful Stakeholder Engagement

While EEI is supportive of this effort, this information was issued late on December 13, 2016, leaving stakeholders with only one week (five business days) to respond. Moreover, the effective date of the draft specification is December 31, 2016, which allows EPA only 10 days (6 business days) to review stakeholder comments before finalizing the specification. Such an accelerated timeline may limit the support EPA receives from key stakeholders, which is essential to the success of the Energy Star program. EEI would suggest that EPA have more reasonable turnaround times for revisions to the Energy Star EVSE program and for other Energy Star products.

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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