



August 1, 2018

Mr. Peter Banwell, Marketing Manager  
US EPA - OAR/PPD  
ENERGY STAR (6202A)  
1200 Pennsylvania Ave NW  
Washington, DC 20460

**RE: Energy Star Version 1.0 & 1.1 EVSE Specification**

Dear Mr. Peter Banwell:

Paired Power, Inc. is grateful for this opportunity to provide feedback on the *ENERGY STAR Version 1.0 and 1.1 EVSE Specification* for AC and DC charging of electric vehicles (EV) being administered by the US EPA and for taking these comments into consideration.

As a 100% solar EV charging technology leader, Paired Power, Inc. is paving the way for increased EV adoption with 100% carbon-free power and free EV charging. As states and utilities create investment programs to support EV charging infrastructure, they regularly request that EV charging products be ENERGY STAR certified. While Paired Power supports the ENERGY STAR certification of EVSE grid-tied products, as an off-grid 100% renewable EV charging infrastructure provider, we neither qualify for the program nor can be tested, as the energy source is 100% off-grid, self-sufficient solar power. The specification written in *Version 1.0* inadvertently prevents Paired Power's innovative and sustainable technology from participating in these workplace EV charging public incentive programs.

We provided the following comments to the California Energy Commissions (CEC) that has created the CALeVIP incentive program being administered by the Center for Sustainable Energy (CSE), as well as to other state agencies operating similar public incentive programs.

**ENERGY STAR EVSE Specification 1.0 & 1.1**

As a 100% solar EV charging technology leader, our recommendation is to require ENERGY STAR Certification for all AC connected Level 2 EV chargers and DC grid-connected EV chargers. However, we request that innovative off-grid and renewable energy DC chargers regardless of charge rate (Level 1, 2, 3) be provided an exemption from ENERGY STAR testing procedures and either automatically qualify as an ENERGY STAR certified product or officially designate that EVSE off-grid products are compliant with ENERGY STAR certification standards. This exemption would allow alternative DC, off-grid, self-sufficient

(via solar power source and included battery), and renewable energy-charged systems for workplaces and other community site locations to be included in future public incentive programs and RFP's from state agencies.

Also, noted in the ENERGY STAR Program Requirements document<sup>1</sup> that DC Output EVSE isn't eligible for ENERGY STAR certification. This specification prevents new innovative EVSE solutions from entering the market if ENERGY STAR certification is required on a blanket basis for all EV infrastructure programs and bids. Therefore, we recommend that ENERGY STAR staff exempt off-grid and renewable energy DC chargers regardless of charge rate (Level 1, 2, 3) in the upcoming *Version 1.1* which will allow these types of charging stations to be included in these public EV charging incentive programs and not be locked out of the marketplace.

Our team would be happy to answer questions or brainstorm guidelines that embrace the spirit of the ENERGY STAR program without impeding innovation for EV charging infrastructure projects. We hope you'll adjust requirements in upcoming *Version 1.1* to reflect these more inclusive guidelines that will benefit EV drivers across the United States.

Sincerely,



D.T. (Tom) McCalmont  
CEO  
Paired Power, Inc.

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<sup>1</sup> ENERGY STAR Program Requirements for Electric Vehicle Supply Equipment – Eligibility Criteria (Rev. Apr-2017), Sec. 2.2.; Subsection 2.2.2; pg. 6.