



Pacific Gas and
Electric Company®



SOUTHERN CALIFORNIA
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January 20, 2021

Mr. James Kwon
ENERGY STAR Program
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue NW
Washington, DC 20460

Topic: ENERGY STAR® Version 1.1 DC EVSE Final Draft Specification

Dear Mr. Kwon:

This letter comprises the comments of the Pacific Gas and Electric Company (PG&E) and Southern California Edison (SCE) in response to the United States (U.S.) Environmental Protection Agency (EPA) ENERGY STAR® Version 1.1 for Electric Vehicle Supply Equipment (EVSE) Final Draft Specification.

The signatories of this letter represent some of the largest utility companies in the Western U.S., serving over 29 million customers. As energy companies, we understand the potential of appliance efficiency standards to cut costs and reduce consumption while maintaining or increasing consumer utility of products. We have a responsibility to our customers to advocate for standards that accurately reflect the climate and conditions of our respective service areas, so as to maximize these positive effects.

We appreciate this opportunity to provide the following comments about this specification and commend EPA for finalizing it. We encourage EPA to further improve this specification by applying energy efficiency requirements to a wider range of Direct Current (DC) Fast Charger products than in the current scope. In support of this, we offer the following comment:

1. **We recommend that Operation Mode Requirements for DC-Fast Chargers include models with power output greater than 65 kilowatts.**

In September of 2020 the California Energy Commission released the *2020-2023 Investment Plan Update* for the Clean Transportation Program.¹ The update details a plan by the state of California to invest hundreds of millions of dollars in EVSE over the next several years, “including 10,000 direct-current, fast-charging ports.” Governor Gavin Newsom’s Executive Order N-79-20, signed on September 23, 2020, also set a state goal that 100 percent operating medium- and heavy-duty vehicles be ZEVs (zero emission vehicles) by 2045. California municipalities are leading the way by electrifying their vehicle fleets, including transit and school busses. For example, the Twin Rivers Unified School District in California already has a fleet of 40 electric school buses.

One of the most exciting opportunities for electric school buses is that they may be deployed as “rolling batteries” capable of charging from the grid during times of high renewable generation, transporting children without emitting diesel exhaust or greenhouse gases, and feeding power

¹ CEC-600-2020-003-REV.

back onto the grid during system peak.² EVSE used in such applications will be specialized DC Fast Chargers with high rated output power.

As noted in our July 27, 2020, comments on the draft specification, we are concerned that the ENERGY STAR Version 1.1 for EVSE Specification only establishes energy efficiency requirements for DC Fast Chargers with output power at or below 65 kilowatts (kW). DC Fast Chargers are the most expensive class of EVSE, and most purchasers are likely to be governments and businesses. DC Fast Chargers are a rapidly evolving technology and it is unclear what percentage of products on the market are rated above 65 kW but as noted in our earlier comments, DC Fast Chargers rated above 65 kW are now being deployed in major EVSE networks. DC Fast Chargers are industrial devices capable of transferring large amounts of power and should have long service lives. This means that significant amounts of electricity could be saved by encouraging purchasers of DC Fast Chargers to install energy efficient models; we believe that ENERGY STAR is the best tool to accomplish this.

ENERGY STAR is a trusted energy efficiency brand and we believe that many California municipalities would prefer to procure ENERGY STAR qualified EVSE, including DC Fast Chargers for their electric vehicle fleets. Although DC Fast Chargers rated at greater than 65 kW will be able to qualify for ENERGY STAR, we believe that the lack of actual energy efficiency requirements for such EVSE is counter to ENERGY STAR's brand and is not in the interests of DC Fast Charger purchasers. Therefore, we recommend that ENERGY STAR Version 1.1 for EVSE extend energy efficiency requirements to DC Fast Chargers with power outputs up to 400 kW in harmony with SAE J1772.

In conclusion, we would like to reiterate our support for EPA's ENERGY STAR Version 1.1 EVSE Final Draft Specification. We thank EPA for the opportunity to participate in this process.

Sincerely,



Patrick Eilert
Manager, Codes & Standards
Pacific Gas and Electric Company



Karen Klepack
Senior Manager, Building Electrification and
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Southern California Edison

² Highland Electric Transportation <https://www.highlandet.com/>.