



**Pacific Gas and
Electric Company**[®]



James Kwon
Climate Protection Partnerships Division
U.S. Environmental Protection Agency
Washington DC 20460

September 6, 2018

Subject: ENERGY STAR[®] EVSE Draft v1.1 Development

Dear Mr. Kwon:

This letter contains comments from Pacific Gas and Electric Company (PG&E), San Diego Gas and Electric (SDG&E), and Southern California Edison (SCE) on the ENERGY STAR[®] Electric Vehicle Supply Equipment (EVSE) Version 1.1 Specification. We thank the United States Environmental Protection Agency (U.S. EPA) for the opportunity to participate in this process.

The signatories of this letter, collectively referred to herein as the California Investor-Owned Utilities (CA IOUs), represent some of the largest utility companies in the Western United States, serving over 32 million customers. As energy companies with an extensive portfolio of efficiency programs, we understand the potential for equipment efficiency specifications and standards to cut costs and save energy while maintaining or increasing consumer satisfaction. We have a responsibility to our customers to advocate for sensible test procedures, specifications, and standards that accurately reflect the climate and conditions of our respective service areas, to maximize the positive effects of these efforts.

We strongly support U.S. EPA's efforts to develop a new ENERGY STAR Version 1.1 Specification and add DC-output EVSE to the ENERGY STAR program. We are deploying broad efforts to support EV charging infrastructure in California and would benefit from the opportunity to consider leveraging ENERGY STAR certifications when determining utility program requirement for DC-output EVSE. Table 1 below lists the California pilots and programs, including several non-utility programs, that will, or may include DC-output EVSE. Table 1 is based on the publicly available references listed in the Attachment and is not intended to be a comprehensive list.

Table 1: California EV Charging Infrastructure Program Examples

Organization	Description
<p>California Air Resources Board</p>	<p>Medium/heavy-duty vehicles: CARB has proposed \$1 - \$1.7 billion for medium and heavy-duty vehicle incentives, primarily zero emission vehicles. Depending on sector and use case, either Level 2 or Level 3 (a.k.a. DC Fast Charging or DC FC) will likely be required to support medium and heavy-duty vehicles. Program documents are not specific about whether the program will provide incentives for charging infrastructure.</p>
<p>California Energy Commission</p>	<p>Passenger vehicles: The Energy Commission's "ARFVTP" program has funded 116 "corridor" chargers, primarily DC FC, and 352 more are planned. Medium/heavy-duty vehicles: The Energy Commission also intends to consider funding charging infrastructure for medium and heavy-duty vehicles, which may include DC FC. The Energy Commission is requiring that all eligible vendors for their CALeVIP EV charging incentive program provide proof of application to the ENERGY STAR program before they can have their equipment placed on the list of approved EV charging equipment.</p>
<p>California Public Utilities Commission- NRG settlement</p>	<p>Passenger vehicles: EVgo is required to install 200 DC FC in California per the original CPUC-NRG settlement agreement with the CPUC and has currently installed 287.</p>
<p>PG&E</p>	<p>Passenger vehicles: A pilot program will include 52 sites with DC FC and 234 stations. Medium/heavy-duty vehicles: A five-year \$236 million program will include utility-owned make-ready infrastructure at 700 sites for up to 8,800 charging points for medium and heavy-duty vehicles. The program will also include EVSE rebates in disadvantaged communities. PG&E's application to the CPUC does not specify whether EVSE will be AC or DC output.</p>
<p>SCE</p>	<p>Passenger vehicles: An urban DC FC Clusters pilot will include up to 50 ports. Medium/heavy-duty vehicles: A five-year \$356 million program for high-powered medium/heavy duty charging electrical infrastructure will potentially include 870 sites with 8,600 charge points and rebates for EVSE meeting specific specifications; A pilot for 20 transit electric buses will include make-readies and rebates for EVSE. SCE's application to the CPUC does not specify whether EVSE for the program and pilot will be AC or DC output.</p>
<p>SDG&E</p>	<p>Passenger vehicles: The "Electrify Local Highways" pilot includes DC FC direct installations. Medium/heavy-duty vehicles: Pilots include installing EVSE at ports and installing infrastructure to support delivery fleets. SDG&E's application to the CPUC does not specify whether EVSE will be AC or DC output.</p>

Source: CA IOU Research (see references listed in the Attachment).

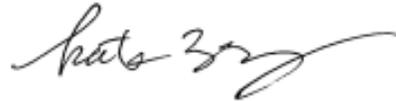
We understand that U.S. EPA has received public comments that you should discontinue this effort, because DC-output EVSE are intended for commercial end-users and are not consumer facing products. We respectfully disagree with this premise, because ENERGY STAR specifications help utility programs differentiate and incentivize products that are energy-efficient and/or support demand response, including commercial products.

In conclusion, we wish to reiterate our support for U.S. EPA's efforts to expand the ENERGY STAR program for EVSE to include DC-output EVSE.

Sincerely,



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Pacific Gas and Electric Company



Kate Zeng
ETP/C&S/ZNE Manager
Customer Programs
San Diego Gas & Electric Company



Michelle Thomas
Manager, Energy Codes & Standards
Engineering Services
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Attachment

Attachment: Table 1 References

CA Organization	Reference(s)
California Air Resources Board	ARB planned medium/heavy duty infrastructure spending outline, no title: https://www.arb.ca.gov/msprog/aqip/meetings/071918_hd3yr_handout.pdf
California Energy Commission	"California Energy Commission 2018-2019 Investment Plan Update for the Alternative and Renewable Fuel and Vehicle Technology Program"; CALeVIP ENERGY STAR® certification process
California Public Utilities Commission- NRG settlement	CPUC/NRG Settlement Agreement ; EVgo charging map
PG&E	"Pacific Gas and Electric Company's (U 39 E) Electric Vehicle Infrastructure and Education Senate Bill 350 Transportation Electrification Program Application" Jan 20, 2017 and " Pacific Gas and Electric Company Prepared Testimony Transportation Electrification SB 350 " January 20, 2017 (see chapter two for details)
SCE	"Testimony of Southern California Edison Company in Support of its Application of Southern California Edison Company (U 338-E) For Approval of its 2017 Transportation Electrification Proposals Before the Public Utilities Commission of the State of California" , January 20, 2017, amended August 1, 2017.
SDG&E	"Application of San Diego Gas & Electric Company (U902-E) for Authority to Implement Priority Review and Standard Review Proposals to Accelerate Widespread Transportation Electrification" January 20, 2017 (see chapter 3 for details); " CPUC Decision 18-05-040 ", May 31, 2018