



James Kwon and Emmy Feldman
Energy Star for Consumer Electronics
US EPA

Washington, DC 20460

Dear James and Emmy

Tritium appreciates the opportunity to provide feedback on the *Energy Star EVSE Version 1.1 Final Draft Test Method* document.

We support the requirements stated in the *Energy Star EVSE Version 1.1 Final Draft Test* with the inclusion of the following suggestions:

Section 3 Definitions (Line 42)

- Inclusion of text to state that EVSE with DC output may have AC input or DC input. This is shown in figure 1.

Section 5 Test Set

- (Line 114). Inclusion of an artificial mains network (AMN) to provide a defined impedance to the UUT. The artificial mains network should be connected in accordance with the applicable product standard, for example IEC 61851-21-2.
- (Line 116). Inclusion of text that recommends “shortest cable possible, sized according to manufacturer’s recommendation”.
- Line (188). Inclusion of text to clarify that relative humidity shall remain between 10% and 80% for Temperate and Hot test conditions defined in Table 4 because of the impracticality of obtaining valid %RH conditions at -7°C.
- Where a manufacturers product can operate at 50Hz and 60Hz, and where the product exhibits no difference in performance and efficiency between the two frequencies, the manufacturer may determine to conduct the test at either supply frequency.

We maintain our commitment to the Energy Star testing. In order to provide greater test coverage across a range of Tritium products, we request an extension of six months from your nominated submission date of 24 October 2019 for initial test data. The feasibility of completing the extent of the requested tests with the range of products we have would be facilitated adequately with a six months extension.

Thank you for your consideration of Tritium’s suggestions and time extension request.

A handwritten signature in black ink, appearing to read "JK", with a long horizontal stroke extending to the right.

James Kennedy, Chief Technology Officer

26th September 2019

