

Dear EVSE Energy Star Team,

Thanks for hosting the webinar Thursday March 7<sup>th</sup> on connected devices. Below are our comments (in red) relative to the EVSE version 1.0 (rev.Apr2017) and EPA's questions.

Best Regards,

Charlie Botsford

3.6.1 Grid Communications: The note below "i" is several years out of date. We recommend deleting in its entirety. In fact, you could just delete "i" as well because it isn't really necessary to call out OCPP.

EPA questions for EVSE suppliers:

- 1) Are there other open source protocols available to enable DR than those listed in Section 3.6 of the Version 1.0 EVSE Specification that EPA should consider? If EPA lists OCPP you should also list Smart Energy Profile 2.0 (IEEE 2030.5) because this and J-3072 are required for V2G operations.
- 2) Are EVSE manufacturers considering integrating the CTA-2045 interface into their network-connected products? Webasto is collaborating with an organization that has adopted the CTA-2045 interface and is evaluating whether to add this communications protocol as an alternative to our standard interface communications protocol.
- 3) Have EVSE manufacturers adopted the ISO 15118 standard into their network-connected products or do they plan to have ISO 15118-capable EVSE in the future? Webasto plans to include ISO15118 capability for European products, but is in a holding pattern for the US market. In the unlikely event the US market adopts ISO15118, we'll be ready.
- 4) If EPA were to develop a grid response test method, what issues specific to EVSE would need to be addressed? Several utilities (e.g., Southern California Edison, San Diego Gas & Electric, and Pacific Gas & Electric) have robust test methods to exercise EVSE networks. This is not really an EVSE test at all. The primary testing is with the back office networks, which includes cyber security testing (penetration testing, etc.).
- 5) What are the business models of companies currently offering grid services through EVSE? Grid services comprise (1) grid ancillary services such as frequency response, (2) demand response, (3) capture of carbon credits such as LCFS programs, and (4) energy storage and energy services aggregation. The business models are numerous, but typically don't have much to do with the EVSE, but instead, the network services providers. The EVSE just needs to have basic network connectivity.

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