



Comments on Final Draft of Energy Star Program Requirements for EVSE January 20, 2021

On behalf of FreeWire Technologies, thank you in advance for considering our comments with respect to the Final Draft of Energy Star Program Requirements for EVSE (“Draft”). FreeWire appreciates the EPA’s continued support of Energy Star certification and the inclusion of direct current fast charging (“DCFC”) stations in the Energy Star program (“Program”). FreeWire offers these comments to convey our strong support of the Program and to request a minor change to the language used to describe DCFC stations with integrated battery management systems.

About FreeWire

FreeWire, with a mission to accelerate electrification at the grid edge, is a certified California Small Business that is manufacturing EVSE hardware in San Leandro, a disadvantaged community. We believe that the incorporation of energy storage with EVSE is fundamental to ensuring a more cost-effective, streamlined, and geographically diverse buildout of EV charging infrastructure. Our Boost Charger demonstrates the potential to deploy DCFC in weeks rather than months at just about any site location. Make ready infrastructure costs for a Boost Charger are a fraction of a typical DCFC project due to the ability to utilize low input power for high power DC output. In addition, installations are less complex and costs are lower because often no new grid infrastructure is needed. Similarly, ongoing operational costs are reduced due to the integrated battery buffer that protects utilities and asset owners from higher energy costs in the form of capacity requirements, demand charges, and peak pricing.

Additional Allowance Clarification

FreeWire appreciates the additional allowance provided for DCFC systems with an integrated battery management system. However, the Draft states that the power allowance for a battery management system is 15W for a “portable DC EVSE with integrated battery.” FreeWire believes that the use of the word “portable” is inadvertent, unnecessary, and would unintended restrictions on the equipment that will be eligible for Energy Star certification. While FreeWire does currently have a portable DCFC station, our Boost Charger is an installed DCFC station that is not “portable” in the normal sense of the word. If this reference is not removed, we are concerned that our Boost Charger could be barred from receiving Energy Star certification. FreeWire requests that the word “portable” be deleted from Table 5 and Table 6.

Conclusion



FreeWire understands the complexity of implementing program requirements and appreciates the opportunity to provide stakeholder feedback. We hope that you will consider our comments so that FreeWire is able to participate in the Program.

Renee Samson, Director of Regulatory Affairs, West

A handwritten signature in black ink, appearing to read 'Renee Samson', written over a horizontal line.