

To: Venera Radulovic (EPA)

From: Kenneth Brown (Leviton)

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Comments regarding the EVSE Energy Star Draft 1 Test Method

1. SCOPE The document has a title for a scope with no scope. A scope and purpose should be added to this test method.
2. Table 2 The input voltage tolerance from Table 2 should be changed from $\pm 4\%$ to $\pm 10\%$ to align with most utility voltage requirements.
3. It should be noted that the minimum current to be used for load testing should be 6 amperes.
4. The unit under test (UUT) input cable length should be consistent for all UUTs tested. Recommend a 1ft. input cable.
5. The document lists a ground current measurement. The ground current is a safety requirement which is already tested at UL and it should not be repeated.
6. Requirement to measure the pilot, dc value, frequency, and duty cycle is not required as it does not relate to power consumption or efficiency.
7. Table 4 A Loading Condition of 40A should be added to Table 4. The loading condition #4 should be changed from 2.0A to 6.0A.
8. The EPA should consider separate or modified requirements for commerce and non-commerce EVSEs.
9. If the EVSE is offered with either a hardwired or cord connected option the unit should be tested in the hardwired configuration.
10. A detailed description of the power measurement apparatus is required in this documents.
11. An Annex should be added to ensure that the energy usage is measured in two to three different labs on a periodic basis (i.e. 6 months) to ensure consistency.