

**KYLE PITSOR**

Vice President, Government Relations

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VIA EMAIL TO: [Radulovic.Verena@epa.gov](mailto:Radulovic.Verena@epa.gov)

Ms. Verena Radulovic  
US Environmental Protection Agency  
ENERGY STAR Program, Product Labeling  
Ariel Rios Building 6202J  
1200 Pennsylvania Avenue  
NW Washington, DC 20460

**NEMA Comments on ENERGY STAR Electric Vehicle Supply Equipment Program**

Dear Ms. Radulovic,

The National Electrical Manufacturers Association (NEMA) appreciates the opportunity to provide the attached comments on the EPA's Proposed ENERGY STAR Program for Electric Vehicle Supply Equipment (i.e. EV Charging Stations). These comments are submitted on behalf of NEMA Electric Vehicle Supply Equipment member companies.

As you may know, NEMA is the association of electrical equipment and medical imaging manufacturers, founded in 1926 and headquartered in Arlington, Virginia. The National Electrical Manufacturers Association (NEMA) represents nearly 400 electrical and medical imaging manufacturers. Our combined industries account for more than 400,000 American jobs and more than 7,000 facilities across the U.S. Domestic production exceeds \$117 billion per year.

NEMA can understand, from a due diligence point of view, EPA investigating potential energy efficiency opportunities in EV charging stations. This is a young but growing industry, supported by NEMA manufacturers, and certain projections indicate it will experience good saturation and growth as it matures. However, it is precisely because the industry is so very new that we most strongly disagree with the notion there is any market to transform with an ENERGY STAR program at this time. In fact we are seriously concerned that premature government involvement will hinder technical evolution, and product development as well as potentially short circuit healthy market forces. As the EPA knows, as products evolve, it would be detrimental to their development and evolution to set characteristics and performance parameter restrictions too soon.

Today, EV charging stations consume very little power for their own operation; the vast bulk of power that enters the charging station is delivered to the EV in question. The EPA's own ENERGY STAR Market and Industry Scoping Report for EVSE<sup>1</sup> shows the majority of representative products tested to be at 99% or better efficiency, and the outliers at >97%. The resulting potential for national energy savings from direct power delivery would appear to be quite low and not cost-effective in terms of the resources required to establish an ENERGY STAR program. Additionally, with respect to standby power, using the U.S. Energy Information

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<sup>1</sup> [http://www.energystar.gov/ia/products/downloads/Electric\\_Vehicle\\_Scoping\\_Report.pdf](http://www.energystar.gov/ia/products/downloads/Electric_Vehicle_Scoping_Report.pdf)

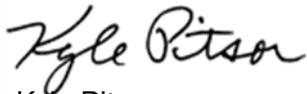
Administration's national average of \$0.11 per kilowatt hour<sup>2</sup> and the aforementioned EPA Scoping Report's estimated potential energy savings for a network connected EVSE of 73 kWhr/yr, the annual savings estimate for such a device is only on the order of \$8.00 per year. Non-networked products which have half the standby power of networked products would cost even less to own and operate. Given that network connectivity allows for greater options of control and data sharing, it is not prudent for the EPA to restrict or detract from this consumer-demanded flexibility and useful data source.

There is also nothing to indicate what the long-term future of such a program might be, and there is concern that ENERGY STAR Partner investments of time and resources will be lost if EPA sunsets the program within a few years. Since the standby power of EV charging stations is already quite low, there seems to be little potential for improvement after the first iteration of a program specification. Typically this leads to EPA sunsetting a program. We are also concerned at EPA's evidenced entry into non-energy attributes in other programs, and believe that EV charging station functionality should be left to manufacturers as an area of competition, not mandated or commoditized by a government-led program. We are also concerned at the cost of the 3<sup>rd</sup> Party Certification program evidenced in other ENERGY STAR product sectors and we are not sure it will be feasible to certify or verify EV charging stations which are not a typical homeowner installed retail product. We urge the EPA to revisit the need for a 3<sup>rd</sup> Party Certification program and consider less-costly alternatives with the assistance from industry.

In conclusion, we most strongly believe it is too soon to identify high-performance products. We seriously question the long-term benefits of an ENERGY STAR program for this product given the limited room for market transformation for these already highly efficient pieces of equipment. We do not support the EPA's efforts and we urge the EPA to forestall evaluation until such time as products are better evolved and the market is more well-established.

If you have any questions on these comments, please contact Alex Boesenberg of NEMA at 703-841-3268 or [alex.boesenberg@nema.org](mailto:alex.boesenberg@nema.org).

Sincerely,



Kyle Pitsor  
Vice President, Government Relations

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<sup>2</sup> [http://www.eia.gov/electricity/monthly/update/end\\_use.cfm](http://www.eia.gov/electricity/monthly/update/end_use.cfm)