

December 17, 2018

Mr. James Kwon
Energy Star Program Office
U.S. Environmental Protection Agency
1200 Pennsylvania Ave, NW
Washington, DC 20460

Re: EDTA Comments to ENERGY STAR® EVSE Draft v1.1 Specification and Test Method Discussion Guide

Dear Mr. Kwon:

The Electric Drive Transportation Association (EDTA) appreciates the opportunity to provide comments to the United States Environmental Protection Agency (EPA) on the proposed ENERGY STAR Electric Vehicle Supply Equipment (EVSE) Draft Version 1.1 regarding Direct Current Fast Charge (DCFC) EVSE.

EDTA is the cross-industry trade association promoting the advancement of electric drive technology and electrified transportation. Our membership includes the entire electric drive value chain – including established and emerging vehicle, battery and component manufacturers, as well as electricity providers, smart grid and infrastructure developers.

Collectively, our membership is developing and manufacturing the vehicles and infrastructure of an electrified fleet. By using electricity to power hybrid, plug-in hybrid, battery and fuel cell electric vehicles, electric drive offers high performing, affordable and efficient alternatives to oil.

The success of this industry provides the U.S., and the world, the clearest path to energy security, sustainable transportation and economic competitiveness in the global race for electric mobility.

This critical effort to electrify transportation includes building a new ecosystem of vehicles and infrastructure that effectively serves diverse consumer needs, as well as dynamic vehicle and grid imperatives. This is especially true regarding the development and deployment of DCFC infrastructure.

DCFC technology and the applications it will serve are diverse and changing rapidly. The variety of emerging and potential passenger and commercial end users create an extremely dynamic market that is discovering and responding to fast-evolving consumer requirements and usecases. For example, DCFC technology ranges from well-established 50kW chargers to 350kW chargers just deployed in 2018. As fleets of buses, delivery trucks, and long-haul trucks electrify, chargers will surpass a megawatt and use a variety of system architectures not yet deployed. To complicate matters, the business case and models for DCFC are also nascent, making DCFC infrastructure sensitive to new requirements.

To keep up with this fast-moving market, most EV charging suppliers, operators, owners, customers and stakeholders have limited resources to focus on a new certification process, like ENERGY STAR.

In light of these factors, EDTA requests that EPA extend the timeline as currently proposed on slide 25 of the “Second Working Session Slide Deck.”¹

Energy Star standards developed without careful deliberation and stakeholder input may lead the market to favor certain technologies over others. The impact of this dynamic should be carefully considered, especially during this early stage of DCFC technology development and deployment.

EDTA recommends a more deliberative and inclusive process with an extended timeline and demonstrated inclusion of multiple EV charging network owners and operators, auto- and heavy-duty EV manufacturers, and EVSE suppliers.

Whenever the standard setting process occurs, EDTA further urges the EPA to establish an inclusive and comprehensive stakeholder process that allows more time than currently allotted so that the complexity of DCFC can be adequately addressed. The diverse manufacturers, applications and end users of the electric drive ecosystem need to be represented and need more time to evaluate any proposal to ensure that any DCFC EVSE specification advances, rather than limits, the effective deployment of efficient, low-cost, and customer-focused electric drive infrastructure, which is essential to a secure and sustainable transportation future.

Thank you for your review and consideration of EDTA’s comments. We look forward to working with you to advance the electric drive future.

Sincerely,
Genevieve Cullen

¹ <https://www.energystar.gov/sites/default/files/Second%20Working%20Session%20Slide%20Deck.pdf>
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