**Comments: CPUC VGI Work Group Meeting**

**Convened: May 15th 2017**

Submitted by: Judy Brunson | Mercedes-Benz R&D, N.A., A Daimler Company| Date: May 18th 2017

To the Convening CPUC Work Group Panel:

Mercedes-Benz R&D, N.A. sincerely appreciates the efforts of the CPUC Panel in convening and hosting the subject VGI Working Group Meetings.

Following the VGI Working Group WebEx meeting held on Monday, May 15, 2017, we deemed it important to make the following general comments regarding the ability of the working group to achieve its intended objective.

While the following general comments are not intended to address any specific stakeholder or entity presentation in the subject meeting, we did see a tendency towards Scope Creep in the materials presented and discussed in the May 15th webex meeting.

Because we recognize the potential importance of such a working group to the overall eMobility market in the U.S., we deem it critically important to highlight and address any topics that may derail the overall value of the working group……….we therefore submit the following specific points in an effort to bring this working group back to its intended purpose.

The portion of the Working Group intended to conclude in September 2017, should only be responsible to deliver the following:

1. **A Validation of the Q3 2017 recommendation of the CPUC to mandate the communications link between the eV and EVSE as ISO/IEC 15118.**

The question was then, and still is today, is a mandate is necessary and if so, which protocol should be mandated?

The motivation continues to be accelerating the adoption of eVs in the U.S. and ensuring interoperability between those eVs and the supporting infrastructure (EVSEs). The goal must be that an eV consumer can purchase any eV, charge at any EVSE charging station, and sign up with any Utility/Energy Provider. This type of interoperability can only be achieved with defined standards.

Although the entire VGI ecosystem (as outlined by the Elaad report) is extremely important to this goal and needs to be considered in its entirety, beyond the EVSE should remain out of scope for this particular working group, or at least this particular phase of the working group. If this working group considers the VGI ecosystem in its entirety, we will not reach any meaningful conclusions within our September timeframe. Reaching a conclusion as soon as possible regarding the eV to EVSEcommunication is of paramount importance to automotive OEMs and EVSE manufacturers so that we and they can begin implementing the necessary communications interfaces in our respective products.

Because of this, we need to correct the extreme scope creep which has dramatically shifted the focus of this working group and return to the original core question:

Is an eV to EVSE communications mandate necessary and if so, which protocol should be mandated?

We see this as a realistic goal/conclusion which we can be achieved by the Working Group within the original targeted September timeframe.

1. **Determine that a sufficient number of Use Cases are already defined in the protocol (ISO/IEC 15118) recommended for mandate by the CPUC in September 2016.**

During the May 15th, 2017 WebEx, there was a strong emphasis on RE-DEFINING use-cases. This is a serious repetition of work. Both the ISO/IEC 15118-1 and SAE J2847/1 standards describe use-cases and requirements for EV-to-EVSE communication. These documents have been created and agreed upon by international groups consisting of global automotive OEMs, EVSE Manufacturers, Utility Providers and other interested stakeholders, many of whom are now involved with the CPUC VGI Working Group.

It is therefore, not necessary to spend value working group time re-defining use cases that have been previously defined by many of stakeholders that are members of the current VGI Working Group.

If the working group insists on RE-DEFINING use-cases, we should start with the existing work which has already been accomplished by the ISO/IEC 15118-1 and SAE J2847/1 standards, and build on these use-cases/requirements. This will save us time and effort and avoid significant rework.

At the very least, we need to set a deadline as to when the working group must finalize the RE-Definition of use-cases so that we can begin to address the question of which protocol is appropriate for fulfilling these RE-DEFINED use-cases.

1. **Agree that eV functionality (as enabled by a mandated communications protocol between the eV and EVSE) is the responsibility of the individual OEM and not this working group.**

OEMs should be free to determine what functionality they would like to offer their respective consumers…..the infrastructure, however, should be able to support a full suite of use cases as defined in and by a communications protocol that has been standardized between the eV and EVSE, ensuring reliable infrastructure interoperability for all OEM eVs.