

Rachel Corn
Chief Growth Officer
GoPowerEV
2435 Alexi Street, Palo Alto, CA 94022
Rachel.corn@gmail.com
4.29.24

Honorable Michelle Phillips
Secretary
State of New York Public Service Commission
Three Empire State Plaza
Albany, NY 12223-1350

Dear Secretary Phillips,

I am writing on behalf of GoPowerEV, a leading manufacturer of electric vehicle (EV) charging infrastructure solutions. We commend the NY PSC for its strong commitment to advancing transportation electrification and reducing greenhouse gas emissions through the Make-Ready Program¹ and expanded under the Make-Ready Midpoint Order.²

Our company is committed to enabling EV adoption in low income multifamily properties. Regulatory policies play a crucial role in creating an environment conducive to the widespread deployment of EV charging infrastructure, and these policies often must both spur innovation and account for a realistic pace of market adoption.

With that in mind, we fully support the Joint Utilities (JU) of New York's efforts to modify the charger communication standards included in the Midpoint Order. While chargers with ISO 15118-2 and OCPP 2.0.1 will provide an improved driver experience in the future, the deadlines for compliance in the Midpoint Order outpace the market's ability to produce conforming L2 equipment. Furthermore, the specific documents referenced within ISO 15118 (conformance with ISO 15118-2 *and* 20) do not align with the National Electric Vehicle Infrastructure (NEVI) program communication standards requirements and those of other states' and agencies' EV programs. Finally, ISO 15118-20 software conformance is far from standard across vehicle manufacturers and testing protocols for ISO 15118-20 have not yet been released.

To ensure companies like ours can both continue to support NY in its clean transportation goals and assist customers to participate in the Make -Ready Programs, we request an immediate extension of the two effective dates specified in the Make-Ready Midpoint Order (in addition to the modifications requested by the Joint Utilities in their petition request):

¹ Case 18-E-0138, *Proceeding on Motion of the Commission Regarding Electric Vehicle Supply Equipment and Infrastructure (EV Proceeding)*, Order Establishing Electric Vehicle Infrastructure Make-Ready Program and Other Programs (issued July 16, 2020) ("Make-Ready Program Order"). The Make-Ready Program incentivizes make-ready infrastructure for eligible Level 2 ("L2") and DCFC EV charging Stations for light-duty vehicles.

² *EV Proceeding, Order Approving Midpoint Review Whitepaper's Recommendations With Modifications* (issued November 16, 2023) ("Make-Ready Program Midpoint Order"). The Make-Ready Program continues to incentivize make-ready infrastructure for eligible Level 2 ("L2") and DCFC EV charging Stations for light-duty vehicles, with modified eligibility criteria from the original Make-Ready Program Order.

- **December 16, 2023 extended by 24 months for the following requirement:** that L2 hardware be capable of ISO 15118 for projects committed on or after Dec 16, 2023.
- **November 16, 2024 extended by 24 months for the following requirement:** that L2 and DCFC electric vehicle service equipment support ISO software and conform with the OCPP 2.0.1 hardware standard.

In conclusion, we urge the Public Service Commission to immediately extend the effective date for L2 projects' ISO 15118-2 hardware requirement and replace the ISO 15118 software and OCPP conformance deadline with a date determined in the petition ruling for both L2 and DCFC projects. Additionally, we recommend that the Public Service Commission adjust the communication standards in line with the JU's proposal and recommend that the adjusted standards apply only to projects committed³ after the aforementioned effective dates.

Thank you for your consideration.

Sincerely,
Rachel Corn
Chief Growth Officer
GoPowerEV

³ A committed project is one that has received a program agreement, a contract in the Make-Ready Program where the Participant agrees to the service connection layout, the initial incentive offering, and other terms provided by the Utility.