



July 16, 2018

VIA EMAIL TO: [Kwon.James@epa.gov](mailto:Kwon.James@epa.gov)

Mr. James Kwon  
US Environmental Protection Agency  
ENERGY STAR Program  
1200 Pennsylvania Avenue  
NW Washington, DC 20460

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

Dear Mr. Kwon,

The National Electrical Manufacturers Association (NEMA) takes the opportunity to provide the following 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.

The National Electrical Manufacturers Association (NEMA) represents nearly 350 electrical equipment and medical imaging manufacturers that make safe, reliable, and efficient products and systems. Our combined industries account for 360,000 American jobs in more than 7,000 facilities covering every state. Our industry produces \$106 billion shipments of electrical equipment and medical imaging technologies per year with \$36 billion exports.

DC Fast charging systems are industrial equipment suited for and marketed to: commercial EV fleet owners, commercial charging network providers, electric utilities, commercial customers, and public EV charging infrastructure providers (EVSPs). They are not suitable for residential applications and are not marketed or sold to EV owners or consumers. Commercial owners and EVSPs are highly-experienced, energy-savings conscious owner/operators already incented towards the best and most efficient designs *for their local needs*. They are also very sophisticated buyers that consider the full range of product attributes and benefits. Further, DC Fast charging systems are often custom engineered to suit the demands of their local applications. These commercial customers would not derive any benefit from an ENERGY STAR program aimed at assisting purchasing decisions.

Additionally the DC Fast charging sector continues to evolve with new products and offerings over a wide range of use cases. It is too early in market development to accurately capture the segment. The EPA should find caution in the ENERGY STAR Distribution Transformers program, which also appeals to a highly-educated customer base. This program has been in pilot for a year and a half with no public participants. As with the Transformer initiative, EPA tax-payer resources should not be expended on DC Fast charging requirements.

In conclusion, we firmly believe it is premature and ultimately probably unnecessary to include high-performance industrial DC Fast Charging systems used by sophisticated commercial customers in the ENERGY STAR program. The market needs time to identify best practices, and allow vehicle manufacturers to work with charging station designers in an area open to innovation and industry-led standardization efforts (when suitable). EPA should remove the DC Fast product category from scope of ENERGY STAR test procedures and performance requirements for the foreseeable future.

Our Member companies count on your careful consideration and we look forward to an outcome that meets their expectations. 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,

A handwritten signature in black ink, appearing to read "Joe Eaves", written in a cursive style.

Joseph Eaves