



July 16, 2021

Mr. Josh Nelson
Chair, Specifications and Tolerances Committee
National Conference on Weights and Measures

**Subject: Item EVF-21.1 A.1 General
Item EVF-21.5 T.2 Load Test Tolerances**

Dear Chair Nelson and Members of the Specifications and Tolerances Committee:

The Alliance for Transportation Electrification (ATE) requests that the Specifications and Tolerances (S&T) Committee maintain Developing status for Items EVF-21.1 A.1 (General) and EVF-21.5 T.2 (Load Test Tolerances). These items have merit, stakeholders continue to engage in development efforts, and such efforts should be allowed to continue unabated in order to advance the broad public interest. Our request is consistent with the S&T Committee's prior recommendations and is necessary for enabling the process required to move forward for eventual voting consideration.

By way of brief background, ATE is a mutual benefit 501(c)(6) non-profit corporation established in 2018. ATE engages with policymakers at the State and local government level across America to remove barriers to EV adoption and to encourage a collaborative and open approach to accelerate the deployment of EV charging infrastructure, support an appropriate utility role by complementing the private/competitive market, and promote interoperability and open standards in all parts of the EV charging ecosystem. ATE's members include about 50 organizations including many utilities, automobile and bus manufacturers, EV charging infrastructure providers and network operators, engineering, companies, and affiliated organizations.

EVF-21.1 A.1 General

The purpose of item EVF-21.1 is "to provide clarity on how Handbook 44, Sec. 3.4 tentative code will apply to existing electric vehicle supply equipment (EVSE) that are in the ground before [the tentative code] becomes effective by identifying which elements are non-retroactive."

At the 2020 Interim Meeting of the Northeastern Weights and Measures Association (NEWMA), the S&T Committee recommended Withdrawal of this item. The S&T Committee's rationale included that there could be a competitive advantage, that a ten year exemption in an evolving technological field is not appropriate, and that the proposal could conflict with User Requirements.

Meanwhile, at 2020 Interim Meeting of the Central Weights and Measures Association (CWMA) and the 2020 Annual Meeting of the Southern Weights and Measures Association (SWMA), the S&T Committees noted many of the same issues. These S&T Committees, however, concluded that the provision should move forward as a developing item.

We strongly concur with the recommendations of the CWMA and the SWMA in maintaining this as a developing item. We are also familiar with the Form 15 justifications provided by the Joint EV submitters, which articulate the highly detrimental impact that would occur if EVF-21.1 A.1 General is withdrawn. Significant efforts have been invested in refining this provision, and withdrawal of the item at this time would be premature and not consistent with engaging broadly with all stakeholders in this important process. Accordingly, we urge the S&T Committee to permit EVF-21.1 A.1 General to retain Developing status.

EVF-21.5 T.2 Load Test Tolerances

The purpose of item EVF-21.5 is “to create separate metering requirements for DC [electric vehicle supply equipment] due to significant technology differences and challenges between AC and DC systems.”

The original justification for this provision is that “DC metering solutions are still being researched and developed and are not yet commercially available to be integrated into DC chargers at scale and at reasonable cost.” Despite that fact that progress is being made, and that customers are not registering complaints, the NEWMA recommended that the item be Withdrawn. The CWMA, the SWMA, and the Western Weights and Measures Association (WWMA), meanwhile, all recommend that this item be assigned Developing status.

We understand that more data and more discussion will be useful in developing language that will be broadly acceptable. Hence we agree with the CWMA, the SWMA, and the WWMA that the item continue to be assigned Developing status.

Conclusion

We are aware that the subject of EV charging is complex and time-consuming, as evidenced by the decade of hard work by dedicated professionals at NIST, the NCWM, in States, and among industry participants. Given the current Developing status and the momentum achieved to date on the topics listed above, we urge the S&T Committee permit these and other EVF provisions to retain Developing status

We look forward to actively engaging in this and related proceedings, and working with the National Conference to develop balanced items that both move public goals of zero emission vehicles forward as well as protecting the interests of consumers and vehicle owners.

Very truly yours,

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