



October 20, 2022

National Conference on Weights and Measures
Specifications and Tolerances Committee
Mr. Jason Glass, Chair
1135 M Street, Suite 110
Lincoln, NE 68508

Dear Chairman Glass:

We are the convenors of the NIST U.S. National Work Group on Electric Vehicle Fueling and Submetering's Electric Vehicle Fueling Equipment Subgroup (SG). As convenors of the SG, we have the responsibility to inform others in the community of the status of SG technical matters.

We are writing in reference to an October 15, 2022 letter from the submitters of NCWM Specifications and Tolerances (S&T) Committee's Item EVF-23.6, which we received yesterday afternoon via the S&T Committee's List Serve. This is to clarify references made in the letter which imply SG approval of the proposals in S&T Item EVF-23.6. The submitters of S&T Item EVF-23.6 reference the results of a June 2022 SG ballot, noting they believe that the SG's decisions indicate support of Item EVF-23.6.

The SG has not reviewed nor reached conclusions on the changes recommended in EVF-23.6 or other new items (EVF-23.4 and EVF-23.5) that propose alternative modifications to the Handbook paragraphs T.2. Load Test Tolerances and/or S.5.2. EVSE Identification and Marking Requirements. Though the results of the SG's June 2022 ballot indicate the SG's support for modifications to the tolerances and marking requirements, this should not be construed as supporting the specific changes recommended in Item EVF-23.6 or other items on the Committee's agenda.

The submitters state that the proposal in S&T Item EVF-23.6 and the recommendations agreed upon by the SG in its June 2022 ballot are "nearly identical." However, there are some key differences between the two proposals. Specifically: (1) the proposal in EVF-23.6 includes two different retroactive dates (2028 and 2034), but the SG's agreed upon language does not include any retroactive dates; and (2) the wording of the marking requirements in EVF-23.6 differs from that of the SG's agreed upon language in areas such as the magnitude of the tolerances and the specific conditions under which they would apply; the permissible format of required markings; and reference to certification. It is important to note the contrasting elements in the SG's recommendations came after careful and lengthy debate over the course of several meetings in Spring 2022.

The submitters also state that one of its recommended changes (the addition of a retroactive date) was derived from comments of an individual SG member. Importantly, that change has not been reviewed, discussed, and agreed upon by the SG through consensus or formal voting.

As convenors of the SG, NIST will continue to provide the S&T Committee with written and verbal input on S&T Committee items related to electric vehicle fueling systems and as explicitly directed by the SG. We aim to provide input on such items on the S&T Committee's current agenda at the 2023 Interim Meeting.

We appreciate your posting this letter on the S&T Committee's website so that other members in the weights and measures community have the opportunity to review and consider our comments. If you or other members of the S&T Committee have questions regarding the actions of the SG or information provided in this letter, please contact us.

With Kind Regards,

Juana Williams

Juana Williams, Technical Advisor

Tina G. Butcher

Tina Butcher, Chairman

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