

September 9, 2016

VIA ELECTRONIC FILING

Public Utility Commission of Oregon
201 High Street SE, Suite 100
Salem, OR 97301-1166

Attn: Filing Center

RE: AR 599 - KnGrid's Comments in the Rulemaking to Prescribe Application Requirements for Transportation Electrification Programs

KnGrid, Inc. appreciates the opportunity to provide comments in the above-referenced rulemaking. The Company provides the following comments pertaining to the draft rules served on July 13, 2016.

Transportation electrification encompasses a wide variety of applications including catenary systems for buses and even aviation. KnGrid is focused on standards-based charging of plug-in electric light and heavy-duty road vehicles. We promote the **ISO/IEC 15118** communications standard (the world's only global, common, unique standard for grid- and battery friendly charging of electric vehicles).

We urge the commission to add the inclusion of this communications standard in its requirements as the standard is now being adopted and implemented by automakers worldwide for DC Fast Charging and AC level 2 smart charging. The standard Oregon ratepayers to enjoy an eMobility future where:

- > the highest level of cybersecurity is maintained at all times
- > any PEV owner can safely plug in (AC Level 2) anytime and anywhere and be dispatch-able as a 'certified resource'
- > that helps electric system operators maintain reliable service while achieving Oregon's State RPS and GHG reduction goals
- > seamlessly without confusing the consumer
- > or impacting their transportation needs
- > in a way that lowers their total cost of ownership.

Education about this global standard is an important step for policy makers as fragmentation of the charging station ecosystem with non-standards-based charging stations will confound automaker efforts to simplify the consumer's refueling experience. It should be underscored that ISO 15118 is an OPEN standard. It is complete and already being implemented by automakers listed on the following website:

www.charinev.org

Further, as plug-in electric vehicles are emphatically mobile, we encourage the Commission to carefully consider standardization efforts already underway in neighboring states to ensure consumers enjoy a seamless roaming experience with these exciting new vehicles.

Sincerely,



Stephen G. Davis
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