SPANISH PROPOSAL FOR MODIFICATION OF THE R-10-05

In recent years manufacturers of electric vehicles, especially heavy vehicles, trucks or buses, are trying to load the vehicles in the shortest possible time, which is increasing the current of charge especially in the mode of charge in DC, so for that reason, the power of the artificial networks that the laboratory must use, must be of greater capacity each time, and not even the manufacturers of these devices can build them, it is difficult to know where the maximum current will be that they would arrive, and of course for the laboratories that would be forced to go acquiring new networks every time.

For that reason I have prepared this proposal:

The current text of the regulation referring to the current of charge during the majority of the tests where artificial networks are to be used is the following:

*“The state of charge (SOC) of the traction battery shall be kept between 20 per cent and 80 per cent of the maximum SOC during the whole frequency range measurement (this may lead to split the measurement into different sub-bands with the need to discharge the vehicle's traction battery before starting the next sub-bands). If the current consumption is adjusted, then the current shall be at least 80 per cent of its nominal value”.*

With this text it is understood that when the current of charge can be adjusted, that it is adjusted to 80%, but does not specify if this possibility of adjustment, is implemented by the vehicle or can be external (recharging station). Technically if the current of charge is NOT regulated by the vehicle, it does not really affect the tests, Which really affect during test it is the installation in the vehicle of the wiring, from the point of view of antenna effect, and the systems of communication and monitoring of the charge, which operate in the same way with more or less current of charge, but in no case the current of charge. It would be totally different if the regulation system is inside the vehicle, because in itself it could radiate or be affected by a radiation.

For all this, the proposed change would be as follows:

Change the phrase *"If the current consumption is adjusted"* by the following *"If the current consumption can be adjusted for a system installed inside the vehicle",* both in complete vehicle cases and in ESAs.

This change would affect Annexes 4, 6, 7, 9, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21 and 22.



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