

| DOCKETED | |
|-------------------------|---|
| Docket Number: | 22-EVI-06 |
| Project Title: | Vehicle-Grid Integration |
| TN #: | 269487 |
| Document Title: | Uber Technologies Comments - Uber Comments on Plug & Charge and Roaming Regulatory Concepts (Docket #22-EVI-06) |
| Description: | N/A |
| Filer: | System |
| Organization: | Uber Technologies |
| Submitter Role: | Public |
| Submission Date: | 4/15/2026 12:18:26 PM |
| Docketed Date: | 4/15/2026 |

Comment Received From: Uber Technologies
Submitted On: 4/15/2026
Docket Number: 22-EVI-06

Uber Comments on Plug & Charge and Roaming Regulatory Concepts (Docket #22-EVI-06)

Additional submitted attachment is included below.



1725 3rd Street
San Francisco, CA 94518

April 15, 2026

California Energy Commission
Fuels & Transportation Division
715 P Street
Sacramento, CA 95814

RE: Uber Comments on Plug & Charge and Roaming Regulatory Concepts (Docket #22-EVI-06)

Dear Energy Commission staff,

Uber Technologies, Inc (“Uber”) appreciates the opportunity to provide feedback on the Plug & Charge and Roaming Concepts, as presented at the California Energy Commission (CEC) workshop on March 25, 2026. As an innovative global leader in on-demand mobility and electrification, Uber is committed to working with the CEC to explore the most balanced regulatory solutions that meet the needs of all drivers, Charging Network Providers (CNPs), and e-mobility service providers (eMSPs) operating within California’s charging ecosystem.

Today, Uber is the world's most widely available platform for zero-emission rides. Drivers on the platform are adopting EVs up to 5 times faster than average motorists in the US, Canada, and Europe.¹ We’ve invested hundreds of millions of dollars to help interested drivers make the switch to electric through incentives, partnerships, and product enhancements, and are helping to normalize and accelerate the adoption of electric transport all over the world. We’re specifically focusing our strategy to address the greatest pain points in EV adoption, namely high costs and limited charging access. We’ve introduced in-app features (including a Charge Map, Battery Aware Matching, and Charging Recommendations) that use real-time data to help drivers decide when and where to charge to make the most of their time and earnings. We also recently announced plans to offer discounted charging and tackle “charging deserts” by establishing utilization guarantees with charge point operators that could unlock over \$100 million of new public EV chargers access for drivers in cities globally.²

Uber’s interest in these proceedings is rooted in the requirements of ridehail drivers, who are uniquely dependent on public charging infrastructure. Market data validates the increasing significance of this segment; for example, EVgo recently identified rideshare electrification as a primary driver of its network growth, noting that commercial throughput has doubled over a three-year period and now accounts for 25% of total network volume.³

¹ <https://www.uber.com/us/en/about/reports/sustainability-report/>

² <https://www.nytimes.com/2026/02/18/business/energy-environment/uber-electric-vehicle-charging-stations.html>

³ <https://investors.evgo.com/static-files/32695cee-122d-44d9-9374-36b79b40d6cb>

Unlike the average private vehicle owner, many Uber EV drivers rely almost exclusively on public fast-charging infrastructure to maintain their livelihoods, making seamless technical alignment and cross-network interoperability an operational necessity.

Our drivers report that unreliable or fragmented charging infrastructure results in a direct loss of earnings due to extended downtime, time spent navigating to non-functional chargers, and range anxiety. Ensuring that California's regulatory framework creates a seamless, standardized, and interoperable experience is therefore essential to maintaining the economic viability of the transition for the drivers who use the public network most frequently.

We provide the following detailed comments regarding the regulatory concepts proposed by the CEC on Plug & Charge and roaming.

I. Establish OCPI 2.3.0 as a Minimum Standard and Mandate Specific Modules

Uber supports the Commission's proposal to establish OCPI 2.3.0 as the minimum standard for major CNPs. OCPI 2.3.0 has minimal updates from the previous version, making sector-wide adoption highly feasible. However, the Commission should recognize that the OCPI protocol is modular by design. Under the technical specifications of OCPI 2.3.0, some core functionalities operationalized via specific modules are categorized as optional. While major market participants may successfully negotiate access to these modules via private agreements, a lack of standardization could present a barrier to smaller mobility service providers and new market entrants.

To prevent a scenario where compliance fails to result in functional interoperability, Uber recommends that the Commission explore establishing a baseline requirement for core OCPI business modules. Standardizing a minimum set of functional modules would ensure that the technical infrastructure for real-time authentication and pricing is a baseline requirement rather than an optional, negotiated feature. This approach would lower the barrier to entry for market participants and fulfill the transparency mandates of SB 123 by ensuring that mobility platforms can offer a seamless experience to California drivers without the burden of bespoke technical integrations.

II. Recognize AutoCharge as a Feasible Interim Solution to Mitigate PKI Complexity

Plug & Charge is the desired driver experience - a seamless and integrated charging session. It also provides added security and standardization requiring public key infrastructure (PKI) management. While Uber recognizes the long-term potential of ISO 15118-2, we caution against a premature mandate that could introduce significant technical friction. We echo concerns raised by other industry participants regarding the lack of a mature PKI governance framework. The reliance on intricate certificate exchanges and the current lack of industry-wide consensus on secure certificate storage present substantial near-term scalability challenges that can negatively impact charging success rates.

In the near-term, AutoCharge might be the preferred and most feasible interim solution. Autocharge is simpler to implement on the timelines put forward by the CEC, only requiring a MAC address to identify a vehicle. AutoCharge is also under consideration to be formalized into the OCPI protocol.⁴ However, it is not standardized, may have roaming limitations, and

⁴ <https://go-electra.notion.site/Autocharge-Roaming-with-OPRF-2ca96db3ecf780b4b55acc91f6ca464>

its simplicity may introduce some security concerns including higher risk of fraud and less data confidentiality. The CEC should evaluate the pros and cons of setting minimum standards for AutoCharge vs Plug & Charge, and ensure that the final choice and implementation is feasible for all parties involved in the charging ecosystem.

III. Conclusion

Uber appreciates the opportunity to provide feedback on the CEC's Staff Workshop on Plug & Charge and Roaming Regulatory Concepts. We commend the Commission's ongoing commitment to foster a truly interoperable charging network throughout the state and we look forward to continued engagement on this topic.

Sincerely,

Tessa Sanchez
Head of Sustainability Policy
Uber Technologies