DOCKETED	
Docket Number:	22-EVI-06
Project Title:	Vehicle-Grid Integration
TN #:	269490
Document Title:	Erika Myers Comments - CharIN Plug & Charge and Roaming Concepts Workshop Comments (Docket # 22-EVI-06)
Description:	N/A
Filer:	System
Organization:	Erika Myers
Submitter Role:	Public
Submission Date:	4/15/2026 1:59:41 PM
Docketed Date:	4/15/2026

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

CharIN Plug & Charge and Roaming Concepts Workshop Comments (Docket # 22-EVI-06)

Additional submitted attachment is included below.

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April 15, 2026

California Energy Commission
715 P Street
Sacramento, CA 95814

RE: Plug & Charge and Roaming Concepts Workshop, Docket No. 22-EVI-06

Dear Energy Commission Staff:

The Charging Interface Initiative (CharIN) is the largest global association focused on the electrification of all forms of transportation based on the seamless and interoperable charging experience enabled by the Combined Charging System (CCS), the Megawatt Charging System (MCS), and the North American Charging System (NACS) - also known as SAE J3400. CCS, MCS, and NACS are the global standards for charging vehicles of all kinds. An inclusive, industrywide coalition, CharIN represents over 300 leading e-mobility stakeholders, from automakers to utilities, grid operators, component suppliers, and charging station developers. Nearly 50 of these members are based in North America. A complete list of members may be found on our website at www.charin.global.

CharIN appreciates the opportunity to provide comments to the California Energy Commission (CEC) regarding the potential regulatory concepts on Plug & Charge and roaming presented at the March 25, 2026 workshop. A core mission for CharIN is to enable future-proofed communication between charging equipment and EVs to enable an ever more reliable Plug & Charge customer experience under open protocols and public standards.

Unfortunately, given the limited three-week period for comments overlapping with school and religious holidays, CharIN was unable to compile comprehensive feedback and reconcile key points among our membership. If possible, we would appreciate additional time that would allow us to provide more specific recommendations, or the opportunity to provide comments again on future revised proposals.

CharIN applauds the CEC's commitment to exploring these concepts, and we offer these comments in the spirit of working together to accelerate our shared goals for improved driver experience via interoperable Plug & Charge and roaming.

ISO 15118

Staff requested input on an appropriate technical minimum for delivering Plug & Charge functionality. There is significant industry momentum behind adoption of ISO 15118-2 in the United States, with some vehicles and charging equipment already capable of delivering Plug & Charge experience to drivers today using this

standard. While there will be continued industry effort to develop and implement ISO 15118-20, it would be premature to require it by regulation in California. ISO 15118-2 and ISO 15118-20 are not backwards compatible, so mandating ISO 15118-20 on the charger side does not advance Plug & Charge functionality in the near-term because legacy vehicles and MY2026 EVs by and large are not capable of ISO 15118-20. Should the CEC decide to pursue regulation, it is imperative to focus on the goal of accelerating Plug & Charge functionality to *today's* EV drivers, not just *future* EVs.

Conformance testing

Staff indicated interest in conformance testing, and in this regard, ISO 15118-2 is relatively mature. We support continued alignment with CARB to ensure conformance testing procedures on vehicle and charger are aligned. CharIN is developing a conformance test for ISO 15118-20, with the goal of completion by the end of 2026.

If conformance testing is required, CEC staff indicated that it may be appropriate to establish a phase-in period of 12 months after the regulation is effective. Additionally, in the future, for new products that enter the market after a potential rule is fully in effect, conformance testing should be accepted within 6-9 months after product entry into the California market. Evidence of conformance testing should not be required as a condition before a new charger model is installed for the first time in California. Without ongoing flexibility on timing, new product launches may be delayed, which would slow down new product introduction, and therefore be counterproductive to the goal of improving charging experience.

Plug & Charge functionality and interoperability

To enable Plug & Charge functionality, both charger and vehicle must use the same communications standard. Some legacy EVs may not be capable of ISO 15118, and in the future, some EVs may support both ISO 15118-2 and ISO 15118-20. Likewise, for new and existing charging equipment, there may be variations in readiness between AC and DC products. The patchwork landscape is complex, which is why there is value in establishing ISO 15118-2 as common ground for Plug & Charge.

However, even with a minimum standard established, there will be a patchwork of readiness for ISO 15118-2 and ISO 15118-20, particularly for legacy vehicles and equipment that are no longer manufactured and new upcoming products that must comply with EU-based requirements. There may be certain combinations of vehicles and chargers that are not capable of Plug & Charge, as well as certain combinations of vehicles and chargers that are able to initiate Plug & Charge via ISO 15118-20. Should ISO 15118-2 be established as the minimum standard for Plug & Charge, implementations of Plug & Charge utilizing ISO 15118-2 and ISO 15118-20 are likely to eventually co-exist. Regulation established by the CEC should not inhibit industry actors from moving faster and taking advantage of shared capabilities to deliver Plug & Charge functionality.

Timing of regulatory action and implementation

Staff proposed requiring ISO 15118-2 as a minimum for DCFC installed on or after July 23, 2023 immediately upon effective date of regulation and delaying requirements by three years for AC chargers.

Extended rulemaking processes create uncertainty in the industry by keeping potential requirements "in the air," which may unintentionally encourage industry to pause rather than accelerate. Should the CEC proceed with rulemaking, CharIN recommends a relatively fast rulemaking timeline paired with longer implementation periods to provide both clarity of direction and time to react. Feedback on appropriate timelines may be provided when regulatory concepts are more fleshed out, but at a minimum, CharIN believes a multi-year phase-in for AC chargers is appropriate.

Maintain focus on Plug & Charge for best driver experience

A core challenge to accelerating Plug & Charge is limited industry staff and resources. Often, the individuals tasked with delivering Plug & Charge functionality to drivers are the same individuals responsible for managing the functionality for other methods of payment, such as tap-pay terminals. CEC should consider how establishing a minimum requirement for ISO 15118-2 to unlock widespread interoperable Plug & Charge

functionality may eliminate the need for tap-pay-based methods of payment, particularly for DCFC installed after July 23, 2023. Minimizing the number of technical requirements applicable to chargers will help maintain focus and speed to deliver Plug & Charge.

OCPI 2.3 may be an appropriate minimum with longer phase-in

CEC staff proposed OCPI 2.3 as the minimum standard for roaming, applicable 12 months after the effective date of regulation, alongside conformance testing requirements, also expected 12 months after the effective date, though the exact timeline should be confirmed by the EV Roaming Foundation. OCPI 2.3 is not widely implemented, which calls to question whether 12 months is sufficient time for industry to plan, implement, and test a completely new version of OCPI. Should CEC proceed with OCPI 2.3 as a more "forward-looking" minimum standard, CharIN recommends staff consider a longer implementation timeline than 12 months.

Conclusion

CharIN appreciates the opportunity to provide feedback to the CEC regarding the Plug & Charge and Roaming Concepts Workshop. Generally, we are supportive of the CEC's efforts to improve the customer experience and look forward to continued engagement by staff on this topic.

Finally, we would recommend reviewing CharIN's upcoming position paper to be published in May titled, "***Clarifying ISO 15118 Implementation under AFIR - Commission Delegated Regulation (EU) 2025/656,"*** for additional relevant feedback. The paper will be available at www.charin.global in the Position Papers and Regulation section.

Sincerely,

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