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## ChargePoint Comments

*Additional submitted attachment is included below.*

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April 15, 2026

California Energy Commission
Docket Unit, MS-4
715 P Street
Sacramento, California 95814

RE: Docket No. 22-EVI-06 – Plug & Charge and Roaming Regulatory Concepts

Dear Acting Director Kalafut and Fuels and Transportation Division Staff:

ChargePoint, Inc. respectfully submits these comments in direct response to the questions posed by California Energy Commission (CEC) staff in the Plug & Charge and Roaming Concepts Workshop presentation dated March 25, 2026. These comments reflect ChargePoint's experience deploying, operating, and maintaining large-scale public charging infrastructure in California and nationwide, and are intended to support the Commission's goal of improving driver experience while preserving system reliability, cybersecurity, and long-term investment certainty.

**1. Is ISO 15118-2 appropriate as a minimum standard for Plug & Charge?**
ISO 15118-2 has enabled early Plug & Charge deployments; however, it is a first-generation standard that was not designed to support emerging vehicle-grid integration (VGI) use cases, modern cybersecurity requirements at scale, or meet the needs of a robst and diversified charging network. Treating ISO 15118-2 as a minimum risk locking in functionality that will require medium term replacement as the ecosystem evolves. ISO 15118-2 is not appropriate to establish as a minimum standard.

The Commission's February 2026 statement recognizes that while Plug & Charge offers some benefits for its implementation remains complex and dependent on alignment across vehicles, charging networks, e-mobility service providers, and evolving technical standards. The statement highlights challenges related to interoperability across multiple standards versions, limited conformance testing availability, and the need for mature public key infrastructure solutions (as noted in the Commission's February 2026 statement). These findings reinforce the importance of avoiding premature or overly prescriptive regulatory mandates while the ecosystem continues to develop.

The Commission's statement further underscores the risk of regulatory whiplash associated with relying on interim standards as long-term regulatory endpoints. As the statement explains, ISO 15118, OCPP, and OCPI are all evolving in parallel, with multiple active

versions deployed across the market (as noted in the Commission's February 2026 statement).

As recognized by the Commission, charging infrastructure deployment requires substantial, long-term investment and coordination across many stakeholders (as noted in the Commission's February 2026 statement). Regulatory approaches that depend on short-lived technical minimums increase the risk of stranded investments and divert limited engineering resources away from charger reliability and customer experience improvements. Providing clarity around long-term standards—while acknowledging near-term implementation constraints—supports the stable investment environment necessary to achieve California's zero-emission vehicle goals.

ChargePoint recommends that the CEC take a long-term approach by signaling to the market early its expectation for ISO 15118-20. ChargePoint suggest that through this proceeding the CEC establish 15118-20 as the regulatory end point for these minimum standards and establish a compliance date of 12-18 months after the finalization of all testing protocols necessary to demonstrate compliance.

**2. Is the industry ready for ISO 15118-20 today, or will it be soon?**
ISO 15118-20 clearly represents the future of Plug & Charge and is the appropriate long-term direction for regulatory alignment. The standard introduces mandatory modern transport layer security, improved cryptographic controls, enhanced certificate handling, and support for bidirectional charging and managed energy services. These capabilities align closely with California's grid reliability and VGI objectives.

At the same time, the industry is not yet ready for a near-term mandate of ISO 15118-20. Ecosystem readiness remains uneven across vehicles, chargers, backend systems, and public key infrastructure. For this reason, compliance with ISO 15118-20 should not be required until at least 18 months after applicable conformance testing and certification protocols are finalized.

**3. Are there cybersecurity, hardware, or compatibility concerns that should be considered?**
Yes. Cybersecurity considerations must be central to any Plug & Charge standard-setting effort. Known vulnerabilities exist in first-generation Plug & Charge implementations, and cybersecurity weaknesses can directly manifest as charger downtime, failed sessions, or precautionary shutdowns—undermining the Commission's charger uptime and reliability objectives. Independent industry analysis has identified known cybersecurity limitations in ISO 15118-2, including vulnerabilities in the SLAC protocol that expose charging communications to man-in-the-middle risks. Remediation guidance for these issues increasingly aligns with the security architecture embedded in ISO 15118-20, which mandates modern transport layer security and more robust certificate handling. Treating ISO 15118-2 as a long-term regulatory baseline would risk institutionalizing known

security gaps that could negatively affect charger availability and reliability over time.

ISO 15118-20 addresses many of these risks through mandatory modern security architecture, but achieving these improvements requires time for hardware redesign, backend integration, PKI maturation, and interoperability testing.

A clear signal that ISO 15118-20 is the long-term target—without mandating premature compliance—best supports system resilience, risk management, and reliable driver experience.

**4. How does Plug & Charge implementation differ between AC Level 2 and DC Fast Charging?**

While the core Plug & Charge communication architecture is similar for AC and DC charging, practical deployment challenges differ materially. Particularly, privately funded AC chargers in California may not have the hardware needed for Plug & Charge implementation, the CEC should recognize this and exempt this infrastructure from Plug & Charge requirements.

**5. How should the CEC support public key infrastructure (PKI) for Plug & Charge?**

CEC engagement on PKI is critical to enabling Plug & Charge at scale. Fragmented or duplicative PKI frameworks increase cost and interoperability risk. Supporting standardized, interoperable PKI governance models—coordinated with industry efforts—will help reduce barriers to adoption while improving security and reliability.

**6. Is OCPI 2.3 appropriate as a minimum standard for roaming?**

OCPI standards are already in use across California and support functional roaming today. OCPI 2.3 introduces useful incremental improvements, but it should not be mandated as an immediate minimum. A version-flexible approach—such as allowing OCPI 2.1.1 or later—better reflects market reality while enabling future evolution.

Should the CEC feel a more specific version is necessary OCPI 3.0, coupled with sufficient time for compliance following finalization of testing and certification frameworks would send the appropriate long term regulatory signals to focus the industry. In this instance, ChargePoint recommends 3.0 should not be required until at least 18 months after applicable conformance testing and certification protocols are finalized.

**7. What challenges exist with transitioning OCPI versions and roaming implementation?**

OCPI version transitions require coordinated backend upgrades, certification, integration testing, and in many cases renegotiation of existing contracts. Retroactive mandates would impose significant costs without commensurate driver benefits. Any OCPI evolution should apply prospectively, preserve existing contracts, and provide no less than 18 months of lead time following finalization of testing and certification protocols. Over the long term, OCPI

3.0 represents the most appropriate target for durable, scalable roaming interoperability.

**8. Conformance testing and implementation timelines**
Conformance testing for both ISO 15118 and OCPI remains an evolving landscape. Regulatory compliance obligations should be tied to finalized, widely available testing protocols rather than assumed readiness. Clear sequencing—standards finalization, testing availability, then compliance deadlines—is essential to avoid regulatory whiplash, protect investment, and ensure high-quality, secure implementations. Importantly, conformance testing early in the standardization processes can be time intensive and expensive. ChargePoint suggest that the CEC should rely on self-certifications when possible to preserve precious time and monetary resources for companies. The need to take multiple stations and software systems through testing is an expensive and time consuming endeavor.

**Conclusion**
ChargePoint respectfully urges the Commission to adopt a future-oriented regulatory framework that aligns long-term requirements with ISO 15118-20 and OCPI 3.0, avoids reliance on interim standards as permanent endpoints, and provides sufficient compliance time tied to finalized testing protocols. This approach best supports charger reliability, cybersecurity, investment certainty, and California's long-term transportation electrification and grid integration goals. ChargePoint also notes that beyond the technical standards, there are many practical and business considerations for the adoption of plug & charge and roaming, ChargePoint looks forward to additional conversations with the CEC on these topics and suggest those considerations are equally important to the technical standards.

Sincerely,

Justin Wilson
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ChargePoint, Inc.