

**DOCKETED**

<b>Docket Number:</b>	22-EVI-06
<b>Project Title:</b>	Vehicle-Grid Integration
<b>TN #:</b>	269500
<b>Document Title:</b>	EvGateway Comments - Plug & Charge and Roaming Concepts
<b>Description:</b>	N/A
<b>Filer:</b>	System
<b>Organization:</b>	EvGateway
<b>Submitter Role:</b>	Public
<b>Submission Date:</b>	4/15/2026 5:09:29 PM
<b>Docketed Date:</b>	4/16/2026

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

## **Plug & Charge and Roaming Concepts**

We believe ISO 15118â€™2 remains the most practical standard for current public charging needs because it fully supports Plug & Charge, while ISO 15118â€™20 introduces a significantly different protocol that is more suited to fleet applications. Most everyday drivers simply want to plug in and start charging, not participate in advanced gridâ€™management functions.

At this stage, DC chargers are far more likely to implement Plug & Charge successfully. Many existing AC chargers lack the hardware or firmware capabilities to retrieve essential identifiers, such as a vehicleâ€™s MAC address or VIN to initiate Plug & Charge sessions. This creates a real risk of customer confusion: drivers may pull up expecting Plug & Charge to work, only to wait while nothing happens because the charger does not support it.

Plug & Charge itself is not the biggest barrier. In principle, any charging network could enable it and authenticate customers through their own platform. The real challenge is roaming, specifically, routing each vehicle to the correct payment network. This depends heavily on how much information networks are required or willing to share. Ideally, there would be a secure, shared enclave of customer and vehicle data that networks could use to verify authorization. However, who is going to host this data and many customers maintain accounts across multiple charging networks, and resolving duplicate or conflicting records will take time.