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Electrify America Comments on Plug & Charge and Roaming Concepts

Please find our comments attached. Thank you.

Additional submitted attachment is included below.



April 15, 2025

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

RE: Electrify America comments on the Plug & Charge and Roaming Concept Workshop on March 25, 2026 (Docket No. 22-EVI-06)

Dear Commissioner Skinner and Staff:

Electrify America appreciates the opportunity to comment on the California Energy Commission's (CEC) initial workshop on Plug & Charge and Roaming held on March 25, 2026.

About Electrify America

Electrify America is the nation's largest open Hyper-Fast network of DC fast chargers (DCFC) for electric vehicles (EVs), with over 1,450 chargers across more than 290 locations open to the public in California as of Q2 in 2026. In 2025, Electrify America saw significant growth, with over 20 million charging sessions and surpassing 750 gigawatt hours (GWh) dispensed on our network – a 21% increase over the prior year.

In the United States, Electrify America was one of the first major companies to employ the use of ISO 15118 Plug & Charge in 2018, and we were the first to release this technology into our DC hyper-fast charging network in 2020 – the first in the U.S. to offer this feature. We have since grown to provide this service to customers at our chargers for over nine major automotive brands and continually expand this offering for drivers each year.

Plug & Charge Proposed Minimum – 15118-20

Is the industry ready for ISO 15118-20 for Plug & Charge today, or will it be soon?

Electrify America does not view the industry as sufficiently prepared for -20, and notes that there remain auto manufacturers in the market that still do not support 15118-2. A push to

mandate 15118-20 when industry still has not entirely caught up to -2 would be premature and could end up slowing down the existing natural adoption of 15118-2.

While 15118-20 could offer some technical advantages over -2, -2 and -20 are not backwards compatible. Some of the advantages from -20 will also not be fully realized unless automakers provide open access for third parties to have their Plug & Charge certificates deployed and configured in their vehicles.

Additionally, currently installed infrastructure that meets 15118-2 does not support -20 and would impose a significant financial and technical burden to bring existing equipment into 15118-20 compliance. Any mandate of 15118-20 in the near-term could negatively impact the industry's readiness and implementation speed, as well as exclude many existing vehicles on the road and existing charging infrastructure.

In summary, a number of steps still need to be taken for the entire industry to become ready for 15118-20. We strongly urge the CEC to consider the ability of current EV drivers to access to high powered charging using existing Plug & Charge solutions. Because of these reasons, we recommend the CEC not consider a mandate for 15118-20 at this time.

Plug & Charge Proposed Minimum – 15118-2

With regards to 15118-2 requirements and a proposed mandate, Electrify America suggests that the CEC consider this only as a hardware-capable proposal. Flexibility between 15118-2 and 15118-20 is paramount for the charging industry as we continue to adapt and evolve with changes in software technology and meeting auto manufacturers where they are, individually. It is also important to allow for software flexibility to ensure that we can adapt to driver needs in order to continually enhance the driver experience when charging. Some of this flexibility will also be needed in relation to the idea of conformance testing, which we address later in the letter.

The CEC may want to consider the role it can play to encourage broader support for 15118-2 as a first step prior to any considerations of 15118-20. Industry is finally aligned and moving forward with implementations of 15118-2 and placing a burden of compliance with 15118-20 would not help move towards a fully Plug & Charge future.

Roaming Protocol Proposed Minimum

At this time, Electrify America would ask the CEC to consider simply adopting similar language to the CARB regulatory framework that allowed for "OCPI 2.1.1 or later" to allow for inclusion of OCPI 2.3 as a compliant option. We do not believe it is appropriate for the CEC to set OCPI 2.3 as a minimum standard. Most of the industry operates on 2.1.1 or

2.2.1 and these standards adequately support roaming in today's marketplace. Similar to 15118-20, a minimum standard of 2.3 at this time would place significant financial burdens on providers, as well as potentially negatively impacting the current marketplace.

Electrify America would also encourage the CEC to continue to maintain OCPI capable infrastructure, but not mandate bilateral roaming agreements. These agreements require significant financial and operational burdens, and based on the current market are not necessary to move industry to a full Plug & Charge ecosystem. In fact, due to the time, costs, and other operational barriers associated with bilateral roaming agreements, such a mandate would ultimately take away from scaling up charging infrastructure and move resources away from the implementation of Plug & Charge and other technical improvements that would positively improve the driver experience.

Implementation Timeline and Conformance Testing

Electrify America believes that conformance test reporting is unnecessary and complicated due to the natural adoption of 15118-2 that has already occurred within the industry. In some instances, companies may have made enhancements to improve the standard and the customer experience. One such example was the ability in the past to extend timeouts beyond a standard value to improve the driver experience, which should not be seen as a failed test case.

With enough natural momentum and collaboration already behind adoption of 15118-2, industry is moving towards conformance without regulatory requirements. By nature of the marketplace, itself, 15118-2 adopters are forced to conform to what the industry has deemed a standard. As such, the mandate of conformance from the CEC is not needed in this instance and instead could slow down or disrupt the natural adoption that continues to occur. Lastly, any additional costs for unnecessary formal conformance testing or certification would divert from expanding infrastructure capable of Plug & Charge – thus impeding our ability to satisfy demand.

In summary, third-party conformance testing for 15118-2 is unnecessary, including because it does not account for the natural shaping of the market for 15118-2 that has occurred. Formal third-party testing for conformance does not allow for flexibility or innovative solutions aimed at an improved driver experience and should, therefore, not be considered by the CEC at this time as it could unintentionally create an inferior Plug & Charge system.

Public Key Infrastructure (PKI) and ISO 15118-4

Electrify America observes that the industry is well along with establishing an EVPKI certificate trust list inclusive of policies and procedures ensuring security and interoperability. The SAE EVPKI is recognized by the EC Mobility and Transport Directorate and was adopted as a basis for EU EVPKI by the Sustainable Transport Forum. We encourage the CEC to utilize this industry-wide, vendor neutral and equitable platform as a means to accelerate Plug & Charge and EVPKI adoption.

Similarly, if the goal of the CEC is to advance full Plug & Charge, for 15118-4, the test cases and scenarios the CEC considers should be limited to the Happy Path Plug & Charge test cases from -4. Additionally, the CEC should not mandate or consider any test cases that use EIM as a metric, as this option is often considered a step along the path to reaching full Plug & Charge, and should therefore not be the standard.

Conclusion

Electrify America appreciates the efforts the CEC is undertaking to better understand the current state of affairs for Plug & Charge in our industry and the impacts that it has on the driver. With that in mind, we would encourage the CEC to consider future regulations and proposals through the lens of increasing the driver experience and ensuring real-world accessibility and reliability. We believe you can best accomplish this by:

- Not establishing a minimum standard of 15118-20 and allowing for flexibility of software between -2 and -20,
- Not mandating third-party conformance testing for 15118-2 to allow for past flexibility and future innovations within the standard,
- Establishing OCPI 2.1.1 or later as the minimum standard, without mandating costly and time consuming bilateral agreements between providers, and
- Overall, embracing the natural progress that has been made by the industry in adoption of 15118-2, EVPKI trust list, and Happy Path Plug & Charge.

We look forward to continued collaboration with the CEC throughout this process as we all work to achieve California's clean transportation goals.

Thank you for your consideration of our comments.

Michael Daft

Government Affairs and Public Policy Lead, Western US
Electrify America