

**DOCKETED**

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*Comment Received From: Paul Glenney  
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**CALeVIP 2019 Projects Roadmap - Hubject Public Comment**

*Additional submitted attachment is included below.*



October 12, 2018

California Energy Commission  
Docket No. 17-EVI-01  
1516 Ninth Street  
Sacramento, CA 95814

Re: Alternative and Renewable Fuel and Vehicle Technology Program – CALeVIP 2019 Projects Roadmap

Hubject Inc. appreciates the opportunity to provide input on the California Energy Commission's (CEC) CALeVIP 2019 Projects Roadmap.

Hubject Inc. commends the State of California for its dedication to increasing electric vehicle (EV) adoption and the necessary EV charging infrastructure. California continues to demonstrate its zero-emission vehicle (ZEV) leadership, especially with the Governor's Executive Order calling for 5 million ZEVs in California by 2030 and 250,000 electric vehicle charging stations by 2025.

Hubject is an electric vehicle charging software platform that enables interoperability between networks. Hubject currently connects more than 100,000 charging ports and more than 350 B2B partners on 4 continents. Our vision is seamless EV charging for everyone, everywhere and we share the State's goal of increased EV adoption through enhanced driver experience. As a neutral third-party, Hubject enables easy and convenient access and payment across charging networks for EV drivers by connecting all participants in the electric vehicle charging ecosystem including utilities, automotive manufacturers and electric vehicle service providers (EVSPs).

Hubject Inc. respectfully requests the inclusion of ISO 15118 in the CALeVIP 2019 Roadmap's equipment requirements, allowing the charging stations to have Plug & Charge capabilities. Including ISO 15118 will result in an easy and seamless charging experience for the EV driver, as well as smart charging and the integration of EVs into the grid. ISO 15118 will also help enable bi-directional electricity flow and inductive charging, which will pave the way towards future autonomous charging. With many of the largest global OEMs intending to incorporate the ISO 15118 standard into their vehicles, we recommend the Energy Commission include the need for the CALeVIP charging stations to be ISO 15118 ready.

In addition, we strongly support the inclusion of interoperability as an equipment requirement for the CALeVIP 2019 projects. A major barrier to mass adoption of electric vehicles is consumer anxiety about adequate access to public charging stations and the inconvenience and complexity stemming from exclusive membership requirements currently imposed by multiple service providers. While the number of EV chargers deployed is growing rapidly, they are controlled and managed by different operators, each with their own registration, mapping and access method, thereby rendering one operator's chargers inaccessible to the customers registered with another operator. This fragmentation requires EV drivers to register and manage several memberships to access chargers with multiple RFID cards and mobile apps. Achieving seamless interoperability between EV charging operators, including locating, activating, and paying in a secure manner, is needed to eliminate consumer concerns about compatibility, accessibility, and e-commerce security.



# HUBJECT

Hubject requests that the Energy Commission remain open to various protocols to optimize interoperability and allow for easy interaction between charging operators. This will provide end users with complete information in a secure manner to simplify driver experience, maximize convenience, minimize cost, facilitate a positive driving experience, and help drive EV adoption. Specifically, there is a need to include Open InterCharge Protocol (OICP); it is the most commonly-used and inclusive interoperability protocol worldwide.

Thank you for your consideration; we look forward to continuing to work with the CEC to make EV charging easy and accessible for all. Please feel free to contact me if you have any questions.

Sincerely,

Paul M. Glenney  
CEO  
Hubject Inc.