

DOCKETED

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*Comment Received From: Paul Glenn
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Subject comments on Medium- and Heavy-Duty Zero-Emission Vehicles and Infrastructure

Additional submitted attachment is included below.



HUBJECT

November 8, 2019

California Energy Commission
1516 9th Street
Sacramento, CA 95814

RE: Docket No. 19-TRAN-02 – Concepts for Medium- and Heavy-Duty Zero-Emission Vehicles and Infrastructure

Dear California Energy Commission Commissioners and Staff,

Hubject appreciates the opportunity to provide comments on the California Energy Commission's (CEC) concepts for medium- and heavy-duty zero-emission vehicles and infrastructure as part of the CEC's Clean Transportation Program.

Hubject's vision is seamless electric vehicle (EV) charging for everyone, everywhere and we share the State's goal of increased EV adoption through enhanced driver experience. As a technology company, Hubject enables interoperability between charging networks and prepares the EV ecosystem for the ISO 15118 protocol. As a neutral third party, Hubject works with utilities, automotive manufacturers and electric vehicle service providers (EVSPs) to enable backends with Plug&Charge through ISO 15118. Plug&Charge facilitates an improved charging experience, allowing EV drivers to plug in their EV and the charging session automatically starts.

Hubject supports the allocation of \$30 million specifically for medium- and heavy-duty zero-emission infrastructure and vehicles. Within this investment, we respectfully recommend the Energy Commission recognize the importance and benefits of the ISO 15118 protocol for charging, and request that it be included in the criteria for solicitations. ISO 15118 is an international standard defining the vehicle to charging station communication interface, and it provides multiple benefits, including interoperability, security, infrastructure maximization, and cost-effectiveness. The protocol is incorporated into the most popular connector called the Combined Charging System (CCS) and covers all charging-related use cases globally. ISO 15118 includes communication for smart, bi-directional and wireless charging for AC and DC charging, thereby maximizing energy flow management and grid infrastructure (including enabling medium- and heavy-duty vehicles to become Distributed Energy Resources). Furthermore, the foundation of the protocol is security, and many OEMs support the protocol and are already incorporating and implementing ISO 15118 into their vehicles. Prioritizing the use of ISO 15118 will lead to more effective projects, and also be more cost-effective, as it is already in development.

Hubject appreciates the opportunity to provide comments on the proposed concepts for Medium- and Heavy-Duty Zero-Emission Vehicles and Infrastructure and supports the Energy Commission's efforts to support infrastructure for medium- and heavy-duty fleets. We look forward to continuing to work together to help implement the programs and reduce emissions in throughout California.

Sincerely,

Paul M. Glenney
Hubject Inc.