

DOCKETED

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Hubject Comments on ViGIL Solicitation Concept

See attached letter.

Additional submitted attachment is included below.



May 27, 2020

California Energy Commission
Docket 19-TRAN-02
1516 Ninth Street
Sacramento, CA 95814

Re: Vehicle-Grid Innovation Lab (ViGIL) Draft Solicitation Concept

Dear California Energy Commissioners and Staff,

We appreciate the opportunity to provide feedback on Vehicle-Grid Innovation Lab (ViGIL) Draft Solicitation Concept. We are excited to support projects and strategies that can enable faster and more effective testing, validation, and integration of charging infrastructure for electric vehicles (EV).

Hubject, founded in 2012, is focused on increasing EV adoption through simplifying electric vehicle charging; one of the primary barriers to EV purchase. First in Europe through its eRoaming platform enabling cross network charging and now by leading in the development and implementation of Plug&Charge using ISO 15118. This technology not only streamlines charging with faster charging session authentication and authorization, but also enables smart and bi-directional charging, as well as wireless or inductive charging.

Hubject is actively supporting and contributing to ISO 15118, a global charging standard to secure communication between the EV and electric vehicle supply equipment (EVSE), through its development of a functioning Plug&Charge PKI and ecosystem and involvement in CharIN, an EV trade organization developing and establishing Combined Charging System (CCS) connector and ISO 15118 as global standards and certification processes. CharIN has over 180 members, representing a cross section of EV stakeholders, including; automakers, utilities, hardware manufacturers, charging networks and technology companies.

Hubject appreciates the Energy Commissions efforts to fund the Vehicle-Grid Innovation Lab (ViGIL) to address testing, certification, data, and technology gaps for EV charging equipment, by offering funding to support the expansion of an existing EV charging testing facility within California. Within this draft solicitation, Hubject's specific comments include:

- Evaluation Criteria, sub-section (2) Project Readiness and Implementation – Hubject suggests adding criteria to evaluate whether the proposed project includes an operational ISO 15118 PKI & Ecosystem that issues certificates to test all roles within charging events. The PKI and ecosystem ensure the security of the EV charging sessions through a TLS handshake in order to protect user data theft and prevent hacking into the vehicle and charging stations. This is important for evaluating the readiness of potential EVSE and vehicles. Within this, PKI & Ecosystems should have the following qualities:
 - Have successfully demonstrated Plug&Charge using ISO 15118 with EVSE Manufacturers, Auto OEMs and charging networks using their PKI and ecosystem services.



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- Conducts annual audits of partners connected to the PKI to ensure all testing and systems are secure.
- Includes Test & QA systems to facilitate easy and secure testing for partners in ViGIL.
- Hubject respectfully requests that the Energy Commission consider allowing multiple project awards, rather than just one, thus enabling separate specialized testing facilities to be eligible. Specialized labs can provide more thorough, efficient, and accelerated throughput of standards.

We greatly appreciate the opportunity to provide feedback to the Energy Commission on the Vehicle-Grid Innovation Lab (ViGIL) Draft Solicitation Concept. We are glad to provide any additional information and respond to follow up questions.

Sincerely,

Paul M. Glenney

CEO, Hubject Inc.