

**DOCKETED**

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February 2, 2021

Mr. Matt Alexander  
California Energy Commission  
1516 Ninth Street  
Sacramento, CA 95814

**Re : FLO Comments on the CEC's Interoperability Testing Events Solicitation**

Dear Mr. Alexander,

Thank for the opportunity to comment on the Energy Commission's (CEC) concept for interoperability testing events.

FLO is a leading North American charging network for electric vehicles and a major provider of smart charging software and equipment. FLO offers public, commercial, and residential chargers, including Level 2 EV supply equipment (EVSE) and DC fast chargers (DCFC). In North America, FLO has deployed over 35,000 charging stations and manages approximately 500,000 unique charging experiences that transfers 5.5 GWH of energy monthly. FLO's headquarters and network operations are based in Quebec City.

We offer the following comments for the CEC's consideration:

- 1. We support the primary objectives of this solicitation, as outlined on slides 11 through 15<sup>1</sup>.**

The testing and implementation of standards and protocols is a costly, complicated, and iterative process that creates significant market barriers for smaller companies that are commercializing new products. We strongly support the CEC's goal to minimize these barriers and provide technical assistance to businesses across the entire EV ecosystem.

- 2. We support creating a forum for information sharing among key industry groups on the implementation status of various standards and protocols.**

Of all the stated goals of this solicitation, FLO is especially supportive of Objective 4, as outlined on slide 14. Implementation of certain protocols, such as ISO15118, cannot be accomplished by charging providers alone. OEMs have a key role in finalizing and implementing this protocol, and yet the status and timeline for its incorporation in various auto manufacturers' products is extremely unclear. If charging providers are to successfully incorporate ISO15118 into their EVSE product lines, they need significantly more information from OEMs on whether they are implementing all or parts of ISO15118, and the timeline for implementation. Charging providers at least one to two years to incorporate new protocols and standards into their product roadmaps.

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<sup>1</sup> Alexander, Matt. Draft Solicitation Concept for Interoperability Testing Events Request for Proposals. January 1, 2021.

- 3. The activities funded by this solicitation must have buy-in from OEMs to ensure it will meaningfully help advance their efforts to implement various standards and protocols.**

Once again, given the key role of the OEMs in the implementation of standards and protocols, we strongly encourage the CEC to consult with various OEMs directly to ensure that the activities and tools this solicitation will offer truly support their product testing needs. The OEMs, like charging providers, are likely at different stages of product development and implementation of ISO15118; therefore, this solicitation should broadly support the needs of many OEMs, and ideally should have their buy-in for this RFP to be successful.

- 4. We encourage the CEC to consider increasing this solicitation's funding to \$3 million to ensure there is plenty of funding to comprehensively test and implement protocols and standards.**

Given the inherent complexities and costliness of implementing standards and protocols, FLO is concerned that \$1 million for the solicitation may be too low. Between charging providers and OEMs alone, there are many companies that will likely seek support from the CEC to test any number of protocols, as outlined in the presentation. Especially if the initial testing events are successful, it will likely attract even more businesses' participation. Overall costs have the potential to add up fast. If the CEC intends to thoroughly vet implementation of these protocols across the entire industry, then FLO respectfully encourages the CEC to increase the allocation of this solicitation to \$3 million.

Thank you for your consideration,

*[Electronically submitted]*

Cory Bullis  
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