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Supplemental Comments of Siemens and Veloce Energy on Interoperability

Additional submitted attachment is included below.

SIEMENS

VELOCE

VIA ELECTRONIC FILING

October 11, 2022

Caltrans & California Energy Commission
Re: Docket No. 22-EVI-05

Re: Supplemental Comments on NEVI Program Pre-Solicitation Joint Workshop (1 & 2)

Veloce Energy and Siemens (the "Joint Technology Providers") file these supplemental comments on the "National Electric Vehicle Infrastructure Pre-Solicitation Joint Workshop" ("Workshop") that Caltrans and California Energy Commission ("Agencies") staff presented via two sessions on September 7 and 8, 2022.

In these supplemental comments, we stress the importance of having commercially reasonable terms for the transfer of chargers from one back-end provider to another. In our comments, we stated the following about the communications protocol between the chargers and back-end software:

The Joint Technology Providers are strong supporters of open standards and interoperability. For that reason, we support the inclusion of both OCPP and ISO 15118 as technology requirements. Regarding OCPP, the solicitation should require that the chargers be tested to the Open Charge Alliance standards and receive third party certification…Finally, the solicitation should require that OCPP be used for the link between the charger and the back-end cloud, as opposed to a requirement that the charger be "capable" of using OCPP. Capability does not equal interoperability, because the EVSE manufacturer can refuse to connect the EVSE to another company's back end or can impose commercially unreasonable terms to do so. Any OCPP compatibility claims need to be backed up by the manufacturer by providing evidence that the chargers have been and can be actually connected to a third party's back-end system.

The above comments are designed to ensure technical compatibility of chargers from one manufacturer with the back-end software of a different company. However, additional provisions are needed to ensure customers and site owners can cost-effectively switch providers and mix-and-match chargers and back-end software of different companies. While the technologies might interact effectively, a company may make it commercially impractical for customers and site owners to exercise free choice. For example, a company could charge a very high switching fee for switching to a new back-end provider, to either the charger owner or the alternative charger manufacturer or both. High switching fees were a common technique in early mobile telecoms to

lock customers into a relationship with a single telecom provider. The situation with EV chargers is highly analogous and, therefore, highly likely to run into the same problem.

The Joint Technology Providers appreciate the opportunity to submit these supplemental comments.

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