

DOCKETED

Docket Number:	23-ALT-01
Project Title:	2023-2024 Investment Plan Update for the Clean Transportation Program
TN #:	253396
Document Title:	Hubject Comments - Clean Transportation Program Investment Plan Update
Description:	N/A
Filer:	System
Organization:	Hubject
Submitter Role:	Public
Submission Date:	11/30/2023 8:12:44 AM
Docketed Date:	11/30/2023

*Comment Received From: Hsubject
Submitted On: 11/30/2023
Docket Number: 23-ALT-01*

Hubject Comments - CTP Investment Plan Update

Additional submitted attachment is included below.

California Energy Commission
Dockets Office
1516 9th Street
Sacramento, CA 95814

RE 2023-2024 Investment Plan Update for the Clean Transportation Program; Docket #23-ALT-01

Hubject is pleased to provide comments to the California Energy Commission's (Commission) 2023-2024 Investment Plan Update for the Clean Transportation Program (CTP). We thank the Commission and staff for their time and consideration on the critical topic of reliability in the EV charging sector.

Founded in 2012, Hubject's technology platform allows our partners to make EV charging reliable, accessible, and seamless for all EV drivers. To date, we have over 1,000 partners comprised of OEMs, CPOs, EMPs, and EVSEs across 52 countries. We have facilitated over 350,000 interoperable charging ports and connected over 450,000 EVs. Our Interchange platform is the largest global roaming platform for EV charging, providing a scalable, secure, and interoperable marketplace ecosystem for infrastructure and software providers. In addition, Hubject supports the only operable ISO 15118-based Plug&Charge ecosystem and PKI in North America.

Hubject strongly supports the CTP and we are pleased to see the CTP reauthorized until July of 2035. The funding and initiatives spawned out of the CTP have been a key catalyst to driving the success of transportation electrification in California, while serving as a model to other states.

During this workshop, we were pleased to hear that the Commission is seeking opportunities to standardize and accelerate EV charger interoperability. While interoperability and roaming are not the main intent of the ongoing draft reliability regulation, we believe they are integral components in having a truly reliable EV charging system, and should be considered as such. We support the Commission's ongoing efforts on reliability, but we urge you to consider interoperability and roaming as key components of reliability.

In addition to supporting the Commission's efforts on Reliability, we are pleased to learn the Commission may implement interoperability billing standards for roaming between EV charging networks after the passage of AB 123. While it might not be directly visible to the driver, interoperability and roaming is the backbone to an easy and seamless EV driver experience. However, charging networks are not interoperable across North America, and there are currently limited options for roaming to ensure true interoperability across charging networks.

Building on interoperability, Hubject fully supports the Commission's Statement on Charging Interoperability release on 11/14/23. The Commission's vision for a "broad interoperability" and a future where any driver can easily charge on any network are critical to the widescale adoption of transportation electrification. We look forward to participating in the staff workshop on 12/1/23, providing feedback, and working with industry stakeholders on a solution.



Hubject appreciates the opportunity to provide comments and thanks the Commission and its staff for their time and consideration. We look forward to continuing our engagement with the Commission to make EV charging easy, seamless, and equitable for all. Please feel free to contact me if you have any further questions.

Thanks – Brad Groters

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