

DOCKETED

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Hubject Comments on CEC Field Testing Protocol

Additional submitted attachment is included below.

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

RE: EV Charger Field Testing Protocol; Docket #22-EVI-04

Hubject is pleased to provide comments to the California Energy Commission's (Commission) and UC Davis's EV Charger Field Testing Protocol (Test). We thank the Commission and staff for their time and continued consideration of the vital topic of reliability in the EV charging ecosystem.

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.

As more EV charging infrastructure is deployed the gap of sufficient data on reliability continues to widen. When we look to make EV charging easy, seamless, and equitable for all, reliability needs to be addressed and prioritized. Due to the current lack of reliability data, Hubject supports the Commission's and UC Davis' efforts with the Test, and it demonstrates the Commission's steadfast effort to continuing building on the efforts to improve EV charger reliability in California. We are also pleased to see that the driver experience is the overall goal and focus of the Test. To truly understand the reliability of the public charging experience, the perspective needs to come from the EV driver, not an industry stakeholder perspective.

Finalize Draft Protocol – Include Roaming & Plug&Charge (PnC)

It is our understanding that the testing protocol and methodology is still under development. Once finalized, we request that a final draft protocol and methodology be released for stakeholder input and feedback. In addition, subsequent years of the Test should be willing to add additional testing protocol to capture all facets of reliability.

With the Commission publishing the "Interoperability Statement" on November 14th, 2023, and seeking ways to support interoperability and the development of roaming agreements, we request that the testing protocol captures if drivers are enabled to roam across different charging networks and authorize the charge session through the application of their choice. In addition, we urge the testing and reporting of PnC ISO15118compatible EVs and EVSEs. Codified in the NEVI Minimum Standards, PnC allows the driver to authenticate a charge session with simplicity and ease by just plugging in, which needs to be factored into the driver's reliability experience.

Interim Report & Workshop

According to the presentation during the workshop, the Test will not be publishing a final report until Summer of 2026. While we understand there is significant lead time with a project of this scope, we request the Commission publish an interim report and host a public workshop to discuss findings, refine testing protocol, and to solicit stakeholder feedback.

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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