CalETC Comments on Statement and Workshop on Charging Interoperability

Additional submitted attachment is included below.

December 22, 2023

California Energy Commission
Re: Docket No. 22-EVI-06

Submitted via electronic commenting system for docket 22-EVI-06

Re: Statement and Workshop on Charging Interoperability

The California Electric Transportation Coalition (CalETC) appreciates the opportunity to provide comments on the California Energy Commission's (CEC) Statement on Charging Interoperability and workshop held on December 1st. CalETC greatly appreciates Staff's work on interoperability and advancing reliable, seamless, and innovative EV charging in the state.

CalETC supports and advocates for the transition to a zero-emission transportation future to spur economic growth, fuel diversity and energy independence, contribute to clean air, and combat climate change. CalETC is a non-profit association committed to the successful introduction and large-scale deployment of all forms of electric transportation. Our Board of Directors includes representatives from: Los Angeles Department of Water and Power, Pacific Gas and Electric, Sacramento Municipal Utility District, San Diego Gas and Electric, Southern California Edison, Southern California Public Power Authority, and the Northern California Power Agency. In addition to electric utilities, our membership includes major automakers, manufacturers of zero-emission trucks and buses, electric vehicle charging providers, and other industry leaders supporting transportation electrification.

CalETC supports the CEC's vision to achieve broad interoperability "where any driver with any EV can easily charge at any charger on any network."[1] CalETC recognizes the need to harmonize standards across the charging ecosystem and support functional performance between the EV and EVSE, with the end goal of improving the public charging experience for drivers. Reliable charging is a cornerstone to growing the EV market and drivers need assurance that no matter what charger they pull up to, they will consistently be able to receive a charge. A driver-centric approach is key to the transition to electric vehicles. To that end, we recommend the CEC coordinate a workshop with the California Air Resources Board (CARB) to provide stakeholders with a clear plan for charging standards. CARB has not formally proposed, but is considering, requiring vehicles to comply with certain existing standards beyond SAE J1772, including DIN 70121, ISO 15118-2, and ISO 15118-20. We strongly encourage the CEC and CARB to present a coordinated vision of EV-EVSE interoperability and give time for stakeholder feedback – especially when considering the use of forthcoming conformance tests such as CharIn's CCS Extend for future CEC projects.

CalETC supports increasing network roaming ("eRoaming") to simplify consumers' charging experience and increase competition in the marketplace. CalETC recommends the CEC hold a

---

[1] CEC's Statement on Charging Interoperability, p. 2.

workshop on network roaming to consider potential policy solutions and discuss lessons learned from other jurisdictions that have implemented network eRoaming, like Elaad in the Netherlands, ChargeHub in Canada, and Hubject in the EU. The EV market has rapidly expanded in California and there is no single way for EV drivers to access all the different public charging networks, which is inconvenient and can be irritating for drivers. We recommend that as part of the workshop on eRoaming the CEC discuss the pros and cons of a networking hub, peer-to-peer agreements, and a voluntary program, and seek feedback from stakeholders on these options. It is also important to note that OCPI eRoaming is included in the NEVI requirements, and established eRoaming platform providers that have served European and other North American markets are actively adding a multitude of charging networks to their eRoaming platforms. The utilities see great value in these eRoaming platforms as a potential means to enable broad access to chargers with differentiated pricing for targeted customer segments through the utility's customer account.

CalETC encourages the CEC to focus on addressing root cause issues associated with the EV charging experience. Interoperability solutions, including plug and charge capability, that increase the first-time charging success rates should remain a priority. CalETC looks forward to serving as a resource as the CEC considers implementing strategies to enhance the charging experience.

Thank you for your consideration of our comments. Please do not hesitate to contact me kristian@caletc.com should you have any questions.

Sincerely,

Kristian Corby, Deputy Executive Director
California Electric Transportation Coalition