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EVgo Comments on SB 123 Pre-Rulemaking Workshop

Additional submitted attachment is included below.

June 4, 2024

California Energy Commission
715 P Street
Sacramento, CA 95814

Re: Docket No. 24-TRAN-02 – Workshop Presentation on Proposed EV Charger Standards Under Senate Bill 123

EVgo appreciates the opportunity to submit comments on California Energy Commission's (CEC) workshop on proposed Senate Bill (SB) 123 electric vehicle (EV) charger standards held on May 22, 2024. As one of the nation's largest public fast charging providers, EVgo shares CEC's vision for an elevated customer experience for EV drivers and recognizes that a reliable, widespread EV charging network is crucial for scaling EV adoption needed to help achieve California's equity, clean energy, decarbonization, and air quality goals. The company continues to invest in customer-centric initiatives like Autocharge+[2] and EVgo ReNew[3] designed to further enhance the charging experience. EVgo also participates in industry forums such as the National Charging Experience Consortium (ChargeX)[4], Society of Automotive Engineers, and Underwriter Laboratories to promote codes and standards improvements that are foundational for seamless, reliable charging.

To further advance our shared goals for a convenient charging experience, EVgo recommends the following:

1. Continue to monitor the development of CharIN CCS Extended and evaluate opportunities for additional vehicle interoperability testing to support adoption of Plug & Charge (PnC);
2. Consider the capabilities and limitations of roaming in relation to the EV charging experience; and
3. Review the availability and acceptance of other wayfinding methods before considering signage requirements for EV chargers.

1. **Continue to monitor the development of CharIN CCS Extended and evaluate opportunities for additional vehicle interoperability testing to support adoption of Plug & Charge (PnC)**

EVgo continues to expand access to customer-centric features like Autocharge+, which allows EV drivers to seamlessly start a charge simply by plugging in their EV at an EVgo charger without any extra steps.[1] Over 50 EV models are eligible for Autocharge+, and the percentage of EVgo charging sessions initiated with Autocharge+ nearly doubled over the course of 2023 with over 18% charging sessions on the network starting with this payment method in Q1 2024.[2] EVgo remains committed to expanding access to convenient payment options for all EV drivers.

EVgo appreciates the CEC's focus on enhancing the EV charging experience by exploring more convenient methods to initiate charging sessions. During its December workshop on charger interoperability, CEC staff identified CharIN CCS Extended as a potential certification for ISO 15118-2 conformance.[3] EVgo remains optimistic about the development of CCS Extended as an independent conformance test; however, CharIN recently indicated that CCS Extended will not be finalized until 2025.[4] EVgo recommends that CEC review CCS Extended once it is complete and allow the EV charging industry to carefully evaluate the conformance test to ensure that it successfully enhances interoperability before adopting this test to verify ISO 15118-2 conformance for PnC.

The CEC has also played an important role in facilitating vehicle interoperability testing through initiatives like VOLTS.[5] EVgo encourages CEC to explore further initiatives, such as Charge Yard, that would expand opportunities to test and enable widespread adoption of features like PnC.[6]

2. **Consider the capabilities and limitations of roaming in relation to the EV charging experience**

EVgo appreciates the CEC's interest in roaming-related topics. While EVgo has elected to pursue roaming agreements[7] with other CPOs, roaming does not resolve root cause issues that the CEC

[1] https://www.evgo.com/autocharge/
[2] https://investors.evgo.com/news/news-details/2024/EVgo-Inc.-Reports-Record-First-Quarter-2024-Results/default.aspx
[3] https://www.energy.ca.gov/event/workshop/2023-12/staff-workshop-electric-vehicle-charging-interoperability
[4] https://efiling.energy.ca.gov/GetDocument.aspx?tn=256289&DocumentContentId=92077
[5] https://www.charin.global/events/volts-2023/
[6] https://www.energy.ca.gov/event/workshop/2023-05/staff-workshop-charging-interoperability-and-collaboration-yard-funding
[7] https://www.evgo.com/partner-roaming/

seeks to address in its forthcoming EV charger reliability regulations.[8] Further, implementation of roaming is costly and takes away critical technical staff time from other issues that can better enhance the EV customer experience, including initiatives geared at improving uptime and charging success rates.

It is also important to consider that contactless "tap" payment requirements in SB 123, which better aligns California's EVSE payment regulations with federal standards than California's previous regulations, enable California EV drivers to charge at public charging stations today using a major credit/debit card without a member account or an app if they choose. With this level of open access and available payment options on California's public charging network, EVgo encourages CEC to contemplate potential tradeoffs before further requiring roaming agreements.

The Open Charge Point Interface (OCPI) is the protocol that supports roaming agreements between CPOs and e-mobility service providers (eMSPs) today, but EVgo encourages the CEC to consider the challenges and limitations of OCPI in the context of roaming. One key limitation of OCPI is that CPOs and eMSPs take discretionary approaches to implementing a "standardized" version of OCPI. In other words, it may take extensive time and resources to integrate disparate flavors of OCPI implementations between CPOs and eMSPs that seek to roam with one another. There is also no conformance test for OCPI, which makes it more challenging to execute roaming agreements. Because of some of these complexities, roaming can create issues that can take away from EVgo and CEC's shared goals for a seamless customer experience and, often, this challenge leads to customers creating accounts on multiple platforms to resolve the issues.

Additionally, OCPI does not enable account holders with membership pricing at one CPO to be used at charging stations operated by another CPO. EVgo provides a suite of voluntary plans on its EVgo-owned network that enable EVgo customers to access preferential charging rates. If an EVgo customer enrolled in an EVgo plan seeks to initiate a charge at a station operated by Roaming Partner X, the EVgo customer will not be able to access the preferred rates offered at EVgo charging stations. In this sense, OCPI is unable to translate the pricing benefits that EV drivers have on their preferred network to other roaming partners. In addition, OCPI does not enable CPOs to recognize customers of roaming partner networks when they contact the CPO's call center to resolve a charging issue. Again, this is a complexity that cannot be resolved with OCPI and that hinders an elevated customer experience.

[8] https://efiling.energy.ca.gov/Lists/DocketLog.aspx?docketnumber=22-EVI-04

3. Review the availability and acceptance of other wayfinding methods before considering signage requirements for EV chargers

EVgo notes that the EVSE labeling requirements in SB 123 were already adopted in the CARB's existing SB 454 regulations.[9] As it relates to signage, SB 123 stipulates that EVSE "where commercially reasonable and feasible, may be clearly marked with appropriate directional signage in the parking area or facility where they are located."[10]

EVgo encourages CEC to assess the availability of alternative wayfinding methods before exploring signage requirements that raise the cost of EV charging projects and hamper EV service providers' (EVSP) ability to scale EV charging infrastructure necessary to meet state goals. EVgo, other EVSPs, and technology platforms already provide customers with an array of free, widely available information on public EV charging station locations and features across various EV charging networks. Popular platforms such as Google Maps and PlugShare allow drivers to easily identify charging stations, direct drivers to charging stations with on-site directions, see photos of the EV charging stations to help drivers easily locate them, see reviews from drivers that have previously visited charging stations, rate their own charging experience, and access real-time station information. Additionally, local cities and counties may have zoning and permitting requirements that complicate the use of signage in certain areas. Finally, modern charger designs include lighting and other features designed to make their availability visible at all times of day. This allows both their location status to be seen easily by drivers without an app.

Conclusion

EVgo appreciates the opportunity to provide feedback on CEC's SB 123 workshop. CEC plays an important role in advancing practical interoperability solutions, and EVgo looks forward to continued coordination with the CEC in pursuit of the most effective strategies to improve the EV charging experience for all EV drivers.

[9] https://ww2.arb.ca.gov/sites/default/files/2020-06/evse_fro_ac.pdf
[10] https://leginfo.legislature.ca.gov/faces/billTextClient.xhtml?bill_id=202320240SB123

Respectfully submitted this 4th day of June,

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