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Xeal Energy Comments on EV Charging Network Roaming

See attached comments.

Additional submitted attachment is included below.

June 20, 2024

California Energy Commission
715 P Street
Sacramento, CA 95815

RE: Docket No. 22-EVI-06 Electric Vehicle Charging Network Roaming

Dear California Energy Commissioners and Staff,

Xeal Energy appreciates the opportunity to provide comments on the California Energy Commission's (CEC) workshop, discussing network roaming for electric vehicle (EV) charging. Xeal strongly supports efforts to improve EV charger reliability and provide for a greater consumer experience.

Xeal has developed the next generation of EV chargers to help address the issue of reliability. Xeal was founded by a group of individuals who were also frustrated with no-charge events and sought solutions to this problem. Xeal's charging infrastructure does not rely on a central point of internet connectivity, which causes most of the charging reliability issues today. Instead, users are provided unique and encrypted tokens that authorize, activate, and transact charging sessions without internet service directly between the charger and phone. All the smart computing is done onsite and during this interaction. This means chargers can operate anywhere – including parking garages and communities with limited internet connection and enable a near 100% uptime and frictionless user experience.

Primarily focused on supporting multifamily housing and commercial real estate owners and operators, our partners manage these smart EV charging stations remotely through Xeal's dashboard, providing real-time data on charging sessions, energy management, utilization, and revenue share. Our driver app employs token-based technology for EV drivers to gain reliable access to charging stations without relying on cellular or garage IT infrastructure. Our chargers require zero connection to the backend, therefore there is no "loss of connectivity" because it is always present between the driver's phone and the charger through our secure, short-range communication protocol.

We are generally supportive of efforts to improve the driver experience and provide the following comments as the CEC continues conversations on network roaming:

- *As the CEC moves forward, the CEC should remain technology neutral and allow multiple communication protocols to thrive. Although OCPI is a common communication protocol used today for roaming, the technology around EV charging is ever-changing and should allow more time for the market to decide which communication protocols are effective for drivers. We respectfully request including the new generation of EV charging infrastructure technology as it will further the CEC and state's goals to provide accessible and reliable charging infrastructure to give consumers the confidence needed to accelerate the deployment of zero-emission vehicles throughout California and beyond. The technical request is to allow for the support of BLE, NFC, ISO 15118 for local network communication within the charger and in conjunction with cellular or Wi-Fi or LORA or ethernet based portable gateways.*

- *The CEC should focus roaming possibilities where the use case will get the most benefit, such as on busy interstates with public chargers. Roaming agreements should not be required for non-public level 2 chargers and chargers that are not publicly funded. These chargers include those at private residences and multi-family housing sites where the chargers are frequently used by the same drivers who are familiar with the mobile app.*
- *The CEC should consider the complexities of establishing roaming agreements. Companies large and small, with varying technologies and business models will need to negotiate and enter into agreements over time. Smaller companies are at a competitive disadvantage in the market to enter into such agreements as they may have less resources and different technologies. Larger companies may be resistant to roaming agreements with smaller companies in an effort to reduce competitiveness in the market. Our preference is to provide ways to access services and products via third-party integrations without dictating the means by which it occurs. Companies can provide systems tool kits (STKs) to allow others the ability to integrate.*

Xeal appreciates the opportunity to support and provide input on CEC's roaming workshop to improve the EV user experience. We look forward to continuing to work with the CEC and other stakeholders to support the deployment, access, and reliability of light-duty charging infrastructure.

Sincerely,

Michael A. Smith

Michael A. Smith
Head of Deployments and Policy
Xeal Energy