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Hubject Comments on Network Roaming Workshop

Additional submitted attachment is included below.

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

Hubject Inc
200 Spectrum Center Drive,
Suite 300
Irvine, CA 92618

RE: EV Charging Network Roaming Overview; Docket #22-EVI-06

Hubject is pleased to provide comments to the California Energy Commission's (Commission) (EV Charging Network Roaming Overview (Workshop), and we greatly appreciated the opportunity to present our perspective on roaming during the workshop. We thank the Commission and staff for their time and continued consideration of the vital topic of network roaming in the EV charging ecosystem.

Founded in 2012, Hubject's technology platforms supports our partners to make EV charging reliable, accessible, and seamless for all EV drivers. To date, we have over 2,000 partners comprised of OEMs, CSOs, EMPs, and EVSEs across 60 countries. Our Intercharge platform is the largest global roaming platform for EV charging, providing a scalable, secure, and interoperable marketplace ecosystem for infrastructure and software providers. Intercharge connects over 600,000 charging points to over 400,000 EVs. In addition, Hubject supports the only operable ISO 15118-based Plug&Charge ecosystem and PKI (Public Key Infrastructure) in the world, launched in 2019 in North America. Hubject's North American headquarters is in Irvine, California.

The EV charging industry is reaching a critical inflection point due to historical levels of funding, ongoing state level activity, exponential growth in EV charging deployment, increase in EV volumes and a surge new market entrants. These emerging factors have highlighted the lingering and growing issues of interoperability, reliability and network roaming within the US. While the predominate focus has been deploying the physical EV charging infrastructure, the importance of digital infrastructure required for reliable, secure and seamless charging should not be underestimated.

We want to thank the CEC and staff for there continued efforts to address the critical issue of network roaming in EV charging, hosting this Workshop, and releasing the "Statement on Charging Interoperability" on 11/14/23. The inclusion of language for Roaming Hubs will be vital to achieving CEC's vision for a future where any driver, with any EV, can easily charge at any charger, on any network. While it is currently a nascent concept in North America, Roaming Hubs have been in existence in mature EV markets such as Europe for almost a decade. There is empirical evidence abroad demonstrating how roaming hubs help to facilitate interoperability, support rapid industry scaling, and increases competition which subsequently improves network data quality and reliability

Marketplace

Roaming hub marketplaces provides business flexibility and opportunities for CSOs and EMSPs to grow. B2B marketplaces are also not unique, and have shown in other industries to support industry growth and competition.

- **Neutral and Agnostic:** Neutral roaming networks, such as Hubject, support CSO and EMSP needs without being in direct competition.
    - Neutral network roaming hubs DO NOT operate or own a charging network/CSO
    - Neutral Network roaming hubs DO NOT provide a driver-facing solution/EMSP

- **Flexibility:** The marketplace approach enables higher levels of competition and reduces barriers of entry for new market entrants
    - Roaming marketplaces allow all CSOs and EMSPs to connect regardless of their size
    - CSO and EMSPs Partners maintain FULL control of pricing, terms, and flexibility with who they conduct business with. The marketplace provide the technical connection, but does not interfere with bi-lateral commercial agreements between Partners.

- **Standards and Conformance:** Roaming network hubs have shown to support protocol standardization and industry alignment on implementation and conformance.

Roaming network hubs are directly aligned with the Commission's current principles on roaming and reliability. Although network roaming hubs are 'behind the scenes' the direct beneficiary of roaming hubs is the EV driver – who can access greater amounts of networks and choose their app or payment method. For the charging industry, it will provide flexibility, time and cost savings simplifying software development required between partners.

Next Steps

At this juncture, Hubject believes the Commission should seek to incentivize industry stakeholders to enable roaming. We maintain that industry stakeholders should have the autonomy and flexibility to decide how they enable roaming, whether via bi-lateral roaming agreements ('one-to-one') and/or joining network roaming hubs ('one-to-many'). Hubject strongly believes that network roaming hubs offer numerous benefits to industry partners, in addition to EV drivers, and provide a viable solution for many EMPs and CSOs.

a) Network Roaming Hub as an Eligible Cost

Hubject would support the Commission's work to make network roaming hub costs an eligible cost in existing block grants to provide incentive and pathways for CSOs and EMPs to enable roaming easily.

b) Roaming Hub Grant Solicitation and Pilot

In addition, Hubject also supports the development of a pilot solicitation to demonstrate and test broad interoperability in a region of California. With a focus on interoperability, equity and accessibility within EV charging, Hubject requests the Commission develops a roaming hub grant solicitation, which would serve as a proof-of-concept for end-to-end interoperability using network roaming hubs. The solicitation will help demonstrate to drivers, the industry, and the Commission how digital infrastructure plays a critical role in ensuring EV charging at scale.

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

Director of Policy & Public Affairs

brad.groters@hubject.com

(202) 394-2804