DOCKETED	
Docket Number:	24-EVI-01
Project Title:	U.S. Department of Transportation's Charging and Fueling Infrastructure Grant Program
TN #:	262178
Document Title:	Hubject Comments on CFI Concepts
Description:	N/A
Filer:	System
Organization:	Hubject
Submitter Role:	Public
Submission Date:	3/13/2025 12:42:44 PM
Docketed Date:	3/13/2025

Comment Received From: Hubject
Submitted On: 3/13/2025
Docket Number: 24-EVI-01

Hubject Comments on CFI Concepts

Additional submitted attachment is included below.

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

RE: Joint Workshop on California Charging & Fueling Infrastructure Program Concepts; Docket #24-EVI-01

Hubject is pleased to provide comments on the Joint Workshop on California Charging & Fueling Infrastructure Program Concepts. We thank the California Energy Commission (Commission), Caltrans, Washington Department of Transpiration, Oregon Department of Transportation, and their respective staff for their time and work in developing the West Coast Truck Charging & Fueling Corridor Project (Project).

Founded in 2012, Hubject's technology platforms support our partners to make EV charging reliable, accessible, and seamless for all EV drivers. To date, we have over 2,250 partners comprised of automotive OEMs, CSOs, EMSPs, and EVSE manufacturers across 63 countries. Our Intercharge platform is the largest global roaming platform for EV charging, providing a scalable, secure, and interoperable B2B marketplace for infrastructure and software providers. Intercharge connects over 1,000,000 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, including over 800,000 Plug&Charge enabled vehicles in North America. Launched in 2019, 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, and increase in EV volumes. These factors have highlighted the lingering and growing challenges of interoperability, reliability, and network roaming. 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.

The Need for Interoperability & Marketplace Roaming

The Project sets out an ambitious plan to provide public MHD corridor charging in a Tri-State corridor from British Columbia to Baja. In order to facilitate a seamless, secure, and reliable charging experience for the Project, interoperability and roaming will be central to the Project's success.

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, competition and rapid scaling.

- **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
    - Neutral roaming hubs are focused on providing and maintaining the digital infrastructure supporting CSO networks and 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 whom they conduct business with. The marketplace provides 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. Thereby providing the foundation for more reliable and future proof technologies.

The Need for POI Data

Fleet operators and managers of medium- and heavy-duty electric vehicles require detailed location information to optimize routes and minimize fleet downtime. Buildout of charging infrastructure under California's West Coast Truck Charging and Fueling Corridor Project should consider the location information needs of these fleets across multiple charging locations and use cases.

These charging use cases include public en-route charging, freight destination charging, and semi-public depot charging. In all cases, we encourage industry-wide sharing of charging location information in a standardized location data model to help MHD EV fleets achieve their strategic and operational objectives.

Examples of location data that should be in scope for this project include, but are not limited to:

- Charging-specific information, such as available power, connector types, average uptime, payment methods, Plug&Charge support, and charging schedules
- Distance information between public charging locations
- Availability of overnight and long-term parking
- Turning radius information
- Roof height/clearance information
- Driver amenities, such as restaurants and dining

Urging the Federal Government to Issue New Guidance

During the workshop it was noted that the State Department of Transportation Directors received the memo on 2/6/25 that placed NEVI formula funds on hold, and official guidance on CFI funding from Federal Highway Administration (FHWA) has not been received. We understand the complexity, uncertainty, and fluid nature of the situation; however, we urge the States engaged on this CFI Project to request official guidance from FHWA to provide certainty to states and the eMobility sector.

<u>Commission's Guiding Questions</u>

Should there be a minimum distance between stations?

- Hubject believes that MHD EV owners and drivers will need distance information between public EV charging stations to optimize route planning, particularly for long-haul routes and overnight stops. Distance information between stations along highway corridors should be included in a standardized location data model used across the MHD EV charging ecosystem to support multiple use cases for public and semi-public charging.

Should any specific amenities be required?

- We believe that driver amenities will be crucial for MHD EVs in determining whether a charging location is suitable for the specific needs of drivers and fleet operators. The more detailed the information regarding these amenities, the greater the benefit to these stakeholders. We support the broadest possible variety of amenities information to meet the needs of diverse stakeholders and charging locations, and we encourage the sharing of amenities information in a standardized location data model.

Hubject appreciates the opportunity to provide comments and thanks the Commission, Caltrans, Washington Department of Transportation, and the Oregon Department of Transportation, and their respective staff for their time and consideration. We look forward to continuing our engagement 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