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Project Title:	2019-2020 Investment Plan Update for the Alternative and Renewable Fuel and Vehicle Technology Program
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Comment Received From: Paul Glenney Submitted On: 11/20/2018 Docket Number: 18-ALT-01

## ARFVTP 2019-2020 Investment Plan - Hubject Public Comment

Additional submitted attachment is included below.



November 20, 2018

California Energy Commission Docket No. 18-ALT-01 1516 Ninth Street Sacramento, CA 95814

Re: Hubject's Public Comments on the CEC's ARFVTP 2019-2020 Investment Plan

Hubject Inc. appreciates the opportunity to provide input on the California Energy Commission's (CEC) Alternative Renewable Fuel Vehicle Transportation Program (ARFVTP) 2019-2020 Investment Plan.

Hubject Inc. commends the State of California and the California Energy Commission for their dedication to achieve the state's zero-emission vehicle (ZEV) goals, greenhouse gas reduction targets, and air quality standards. California continues to demonstrate its ZEV leadership, especially with the Governor's Executive Order calling for 5 million ZEVs in California by 2030 and 250,000 electric vehicle charging stations by 2025.

Hubject is an electric vehicle (EV) charging software platform that enables interoperability between networks. Hubject currently connects more than 100,000 charging ports and more than 350 B2B partners on 4 continents. Our vision is seamless EV charging for everyone, everywhere and we share the State's goal of increased EV adoption through enhanced driver experience. As a neutral third-party, Hubject enables easy and convenient access and payment across charging networks for EV drivers by connecting all participants in the electric vehicle charging ecosystem including utilities, automotive manufacturers and electric vehicle service providers (EVSPs).

We commend the CEC for requiring interoperability of EV charging stations funded by CALeVIP. This will eliminate consumer concerns about registering and managing several memberships to access charging with multiple RFID cards and mobile apps; it will enable an easy and seamless charging experience between networks for the EV driver, including locating, accessing and paying in a secure manner.

In addition, we respectfully request CALeVIP to include ISO 15118-ready EV charging stations, allowing the charging stations to have Plug & Charge capabilities. This means EV drivers will no longer need RFID cards or apps to access stations. Including ISO 15118 will result in an easy and seamless charging experience for the EV driver, as well as smart charging and the integration of EVs into the grid. ISO 15118 will also help enable bidirectional electricity flow and inductive charging, which will pave the way towards future autonomous charging. With many of the largest global OEMs, charging networks, and equipment providers integrating the ISO 15118 standard into their vehicles, systems and equipment, we respectfully request the Energy Commission include an additional incentive or priority for charging stations that include software and hardware to be ISO 15118-ready for the CALeVIP program.

Thank you for your consideration; we look forward to continuing to work with the CEC to make EV charging easy and accessible. Please feel free to contact me if you have any questions.

Sincerely,

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Paul M. Glenney CEO, Hubject Inc.