

**DOCKETED**

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*Comment Received From: Paul Glenney  
Submitted On: 3/17/2020  
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**Hubject Comments on CTP Investment Program**

*Additional submitted attachment is included below.*



March 17, 2020

California Energy Commission  
Docket No. 19-ALT-01  
1516 Ninth Street  
Sacramento, CA 95814

Re: HUBJECT's Public Comments on the CEC's CTP 2020-2023 Investment Plan Update

HUBJECT Inc. appreciates the opportunity to provide input on the California Energy Commission's (CEC) Clean Transportation Program (CTP) 2020-2023 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 Executive Order calling for 5 million ZEVs in California by 2030 and 250,000 electric vehicle charging stations by 2025.

HUBJECT, founded in 2012, is focused on increasing EV adoption through simplifying electric vehicle (EV) charging; one of the primary barriers to EV purchase. HUBJECT is supporting this in Europe through its eRoaming platform, enabling cross network charging. Additionally, HUBJECT leads in the development and implementation of Plug&Charge using ISO 15118. This technology not only streamlines charging with faster charging session authentication and authorization but also enables smart and bi-directional charging, as well as wireless or inductive charging.

We commend the CEC for exploring innovative ways to include ISO 15118-ready EV charging stations in funded projects, such as CALeVIP. Plug&Charge capabilities will facilitate EV adoption with the ideal charging experience for drivers, enabling load management for utilities and providing charging hosts with the ability to avoid peak demand charges. With ISO 15118, EV drivers will no longer need RFID cards or apps to access stations but will have an easy and seamless charging experience. ISO 15118 will also enable bi-directional electricity flow, making every EV a potential energy resource 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 consider prioritization of charging stations that include ISO 15118-ready software and hardware in the light-duty electric vehicle charging infrastructure category and the medium- and heavy-duty zero emission infrastructure category.

HUBJECT Inc. also supports a \$5 million allocation of the current Investment Plan funding under medium- and heavy-duty infrastructure and vehicles for a charging testing lab as a part of Concept 5: Innovative Charging. We believe a comprehensive and neutral testing lab is critical to support the smooth introduction of new technologies. A CEC supported lab would provide a location where all stakeholders, hardware manufacturers, automakers, charging networks, utilities and technology developers can come to test their ISO 15118 implementations before wide deployment. We also respectfully recommend the Commission continue dedicating funding to a testing lab through the 2020-2023 Investment Plan's Workforce Training and Development 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,

A handwritten signature in black ink, appearing to read "Paul M. Glenney". The signature is fluid and cursive, with a prominent initial "P" and a stylized "G".

Paul M. Glenney  
CEO, Hsubject Inc.