

DOCKETED

Docket Number:	22-EVI-04
Project Title:	Electric Vehicle Charging Infrastructure Reliability
TN #:	252728
Document Title:	Hubject Comments on Reliability
Description:	N/A
Filer:	System
Organization:	Hubject
Submitter Role:	Public
Submission Date:	10/25/2023 9:29:48 AM
Docketed Date:	10/25/2023

*Comment Received From: Hsubject
Submitted On: 10/25/2023
Docket Number: 22-EVI-04*

Hubject Comments on Reliability

Additional submitted attachment is included below.

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

RE Proposed Regulations for EV Charger Inventory, Utilization, & Reliability Reporting; Docket #22-EVI-04

Hubject is pleased to provide comments to the California Energy Commission's (Commission) Proposed Regulations for EV Charger Inventory, Utilization, & Reliability Reporting (Reliability). We thank the Commission and staff for their time and consideration on the critical topic of reliability in the EV charging sector.

Founded in 2012, Hubject's technology platform allows our partners to make EV charging reliable, accessible, and seamless for all EV drivers. To date, we have over 1,000 partners comprised of OEMs, CPOs, EMPs, and EVSEs across 52 countries. We have facilitated over 350,000 interoperable charging ports and connected over 450,000 EVs. Our Interchange platform is the largest global roaming platform for EV charging, providing a scalable, secure, and interoperable marketplace ecosystem for infrastructure and software providers. In addition, Hubject supports the only operable ISO 15118-based Plug&Charge ecosystem and PKI in North America.

As more EV charging infrastructure is deployed, the gap of sufficient data on reliability continues to widen. As we look to make EV charging easy, seamless, and equitable for all, reliability needs to be addressed, and we are in support of the Commission's current efforts on Reliability. While we are in support, we offer the following recommendations to be incorporated into the final Reliability regulation:

Need for Enforcement

During the October 9th Workshop, many commentors raised concerns about the current lack of enforcement and penalties built into the Reliability draft. We share the same concerns and we support the final regulation incorporating provisions for enforcement, as well as penalties for those who do not comply. Without enforcement and penalties, we do not believe the Commission's efforts on Reliability will be truly successful.

Uptime Requirements

Regarding uptime requirements, we agree and understand that the Commission needs additional data to have a better understanding of the issue and to make further determination. However, while the Commission is collecting this data, we suggest you align with the National Electric Vehicle Infrastructure (NEVI) program's requirements for 97% uptime. Aligning with NEVI in the interim will bring certainty and continuity to industry stakeholders as we continue to address the issue.

New Authority on Interoperability & Roaming

In addition to supporting the Commission's efforts on Reliability, we are pleased to learn the Commission may implement interoperability billing standards for roaming between EV charging networks after the passage of SB 123. While it might not be directly visible to the driver, interoperability and roaming is the backbone to an easy and seamless EV driver experience. However, charging networks are not interoperable across North America, and there are currently limited options for roaming to ensure true interoperability.



While this Reliability regulation does not incorporate interoperability and roaming, we believe they are integral components in having a truly reliable EV charging system. We support the Commission's new authority, and we stand ready to support future efforts on interoperability and roaming.

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@hsubject.com

(202) 394-2804