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PowerFlex Comments_Interoperability Workshop

Additional submitted attachment is included below.



December 21, 2023

California Energy Commission
Docket Unit, MS-4
715 P Street
Sacramento, CA 95814

Re: Docket No. 22-EVI-06—PowerFlex Comments on December 1, 2023 Electric Vehicle Charging Interoperability Staff Workshop and Statement on Charging Interoperability

California Energy Commissioners and Staff:

PowerFlex appreciates the opportunity to comment on the California Energy Commission’s (Commission’s) December 1, 2023 Electric Vehicle (EV) Charging Interoperability Staff Workshop (“Workshop”) and Statement on Charging Interoperability (“interoperability statement”). PowerFlex supports the Commission’s efforts to create a seamless plug and charge architecture between EVs and EV supply equipment (EVSE) in California. Accordingly, PowerFlex provides comments on the following aspects of the workshop in interoperability statement:

- Industry Feedback
- OCPI Partnerships
- Cadence for Implementing OCPI Updates

Industry Feedback

PowerFlex supports the Commission’s efforts to achieve interoperability and the aggressive timelines and requirements it has set in the past on ISO 15118, OCPP, and OCPI for different incentive programs and funding solicitations. PowerFlex additionally supports creating requirements in the future to achieve functional interoperability between all vehicles and EVSE. However, PowerFlex strongly recommends that the Commission continue to gather industry feedback, whether through workshops, comments, in-person testing events or conferences, informal emails, etc., before implementing any new requirements. Doing so will ensure that all future requirements will be possible for industry to achieve and will not cause major disruptions to EV and EVSE adoption and implementation while still pushing the market forward. This will also ensure that a broad range of stakeholders, including EV and EVSE manufacturers, charging providers, software providers, etc., will be able to provide insight into current market realities and future forecasts, providing a comprehensive vision for the Commission to follow.

OCPI Partnerships

Regarding OCPI partnerships, the Interoperability Statement says that “[p]ursuing roaming agreements is a business decision, and these may be developed directly between companies or indirectly using roaming hubs.”¹ PowerFlex understood this to mean that Charging Station Operators would have the choice of how and to which entities they would enter partnerships. However, during the discussion on this topic at the Workshop, it was unclear whether the Commission was considering requiring Charging Station Operators to enter into OCPI partnerships with EMobility Service Providers.

¹ *Statement on Charging Interoperability (ADA)*, November 14, 2023.



While PowerFlex supports the development and use of OCPI, PowerFlex recommends that the CEC does not require Charging Station Operators to enter into OCPI partnerships and rather leaves that open for industry to decide how and with which entities it will contract. This will provide the best flexibility and would allow the market to choose which options best suite customer and driver needs.

Cadence for Implementing OCPI Updates

As new versions of OCPI are developed, PowerFlex asks that there be a grace period of 3-6 months for companies to implement the latest updates. 3 months should be sufficient time to implement “minor” updates given through point releases (i.e. going from version .2 to .3), and 6 months should be sufficient time to implement “major” updates given through whole number releases (i.e. going from version 2 to 3). This grace period will give developers the time needed to build out, test, and implement updates to ensure that they are ready to support the holistic plug and charge experience.

PowerFlex appreciates the opportunity to provide these comments in response to the Commission’s December 1, 2023 workshop Interoperability Statement and looks forward to collaborating with the Commission on this topic in the future. Respectfully,

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