

<b>DOCKETED</b>	
<b>Docket Number:</b>	22-EVI-06
<b>Project Title:</b>	Vehicle-Grid Integration
<b>TN #:</b>	253723
<b>Document Title:</b>	EVSP Coalition Sign-On Letter re Roaming
<b>Description:</b>	N/A
<b>Filer:</b>	System
<b>Organization:</b>	EVSP/Cory Bullis
<b>Submitter Role:</b>	Public
<b>Submission Date:</b>	12/22/2023 8:14:37 AM
<b>Docketed Date:</b>	12/22/2023

*Comment Received From: Cory Bullis*  
*Submitted On: 12/22/2023*  
*Docket Number: 22-EVI-06*

**EVSP Coalition Sign-On Letter re Roaming**

*Additional submitted attachment is included below.*



December 22, 2023

California Energy Commission  
1516 Ninth Street  
Sacramento, CA 95814  
Docket: 22-EVI-06

**Re: EV charging companies support roaming agreements because they benefit drivers**

We applaud the California Energy Commission’s (Commission) interoperability vision for including roaming as an essential component. Our companies serve as both charge point operators and e-mobility service providers (eMSPs) via mobile apps we have developed. We have experience executing one or more roaming agreements – at no additional cost to the driver – and can attest firsthand to how they benefit EV adoption by improving consumers’ charging experience.

Our vision for the mobile app experience. Drivers should be able to seamlessly locate, use, and pay for a public charging station anywhere they drive, no matter what network the station is on, using their eMSP platform(s) of choice, and without being charged additional fees to do so. “Locating”, “using” and “paying” at a minimum should include navigation, real-time data communicating charger brand, availability, pricing information, power level, and connector type(s), and remotely monitoring the charging session.

However, this is only partially the case for California’s EV charging market, requiring special effort from drivers to download multiple mobile apps just to find and use a charging station. This scenario risks driver fatigue with EV charging apps and frustration with the overall experience.

The benefits of roaming. Roaming improves the driver experience and instills more confidence in EVs by easing consumers’ efforts to find a charging station no matter where they go or what network a station is on. It also allows drivers to access these stations seamlessly, while minimizing their use of multiple apps. Furthermore, roaming agreements empower drivers to use their preferred app, which fuels competition within industry to continually innovate and offer them new and improved features to maintain customer loyalty. These forces create a virtuous circle – supporting EV adoption by offering the best charging experience possible, thus creating more interest in EVs.

We support major charging networks increasingly roaming with one another. As the Commission considers policy approaches to accelerate widespread roaming, charging networks need flexibility to negotiate the specifics of their agreements with one another. Major networks can use this flexibility to evaluate trade-offs in roaming strategies by considering things such as cost, speed of execution,

reliability, scalability to manage charging session transactions, innovative pricing mechanisms, cybersecurity, and more.

In our experience, peer-to-peer agreements are paramount to successful roaming because they foster direct collaboration between networks. In the process of establishing a peer-to-peer agreement, companies work together and learn from each other, which helps the industry's development and enhances the capabilities of roaming over time. Direct collaboration between networks also simplifies the process to fix charger failure issues, billing reconciliation, customer support, among other activities.

OCPI is used industry wide. Open Charge Point Interface (OCPI) has become the de facto protocol to enable roaming, and other forms of data communication, in the U.S. Our companies implemented OCPI many years ago and relied on it to enable all our roaming agreements. OCPI is a free, open-source protocol that is continually improved upon by stakeholders and users via the EV Roaming Foundation. Aside from California, Washington State<sup>1</sup> requires charging companies to maintain OCPI for publicly available charging stations and companies must implement OCPI to access National EV Infrastructure Program funds<sup>2</sup>. There is no value in requiring companies to use another protocol at this point; doing so would divert critical resources from existing product development and compliance efforts without creating any practical benefit for drivers. One limitation to OCPI is there is currently no conformance testing available.

More discussion and analysis on roaming is necessary. We strongly encourage the Commission to hold a workshop to discuss its goals with regards to roaming, the history of roaming agreements in the U.S. and how they have benefitted drivers, lessons learned from other jurisdictions, and policy solutions to advance roaming. Roaming is a highly technical issue that requires ample discussion – a workshop helps bring stakeholders together to elicit new or improved insights. We hope it can also help foster collaboration and alignment on policy solutions.

Thank you for your consideration,

Cory Bullis  
Public Affairs Director  
FLO EV Charging

Mal Skowron  
Regulatory Coordinator  
ChargePoint

Michael Daft  
Government Affairs Manager, Western U.S.  
Blink Charging

---

<sup>1</sup> Washington State. Senate Bill 5192 (Das, 2021).

<sup>2</sup> Federal Highway Administration. National EV Infrastructure Program Minimum Standards. February 2023. Pages 76 & 78.