

DOCKETED

Docket Number:	22-EVI-06
Project Title:	Vehicle-Grid Integration
TN #:	253725
Document Title:	Coalition Letter re Roaming
Description:	N/A
Filer:	System
Organization:	Coalition/Bill Magavern
Submitter Role:	Public
Submission Date:	12/22/2023 8:50:15 AM
Docketed Date:	12/22/2023

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

Coalition 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 network roaming is critical to improving drivers' charging experience

Thank you for publishing an interoperability vision for North America's charging ecosystem; we support the Energy Commission's (Commission) definition of interoperability – products must work together seamlessly without requiring special effort from drivers. Achieving mainstream EV adoption requires simplifying the charging experience as much as possible, otherwise, the state risks driver frustration that slows consumer interest in this technology. While there are several aspects to interoperability, EV charging network roaming agreements are paramount to making the charging experience more consumer friendly. **We strongly encourage the Commission to further assess this issue and investigate how to increase roaming agreements between companies.**

First, roaming agreements simplify drivers' charging experience. Drivers commonly use mobile apps to find and use a charging station, however, they are often stuck downloading many apps to use any number of charging networks during their travels. Toggling between multiple apps needlessly adds extra steps for drivers, which, in our view, qualifies as "special effort," as defined by the Commission's interoperability definition. This is a clunky driver experience and therefore it is critical to reduce this friction.

Second, roaming agreements give consumers the freedom to use their favorite app. Not all companies' apps are alike, which could mean a driver must navigate varying user interfaces, functionalities, and app settings if required to use multiple apps, risking frustrating inconsistencies in their charging experience. Drivers should not have to sacrifice convenience or functionality to access a company's charging stations via a proprietary app.

Finally, roaming agreements create competition that challenges companies to continually improve their app experience — such as offering new features, improving user interface, communicating data more effectively, or providing other benefits. This is a win-win for drivers and companies alike — drivers' needs are put first, and better charging experiences will lead to more consumer interest in EVs.

We strongly encourage the Commission to hold a workshop in 2024 to discuss in depth the types of roaming methods, lessons learned from other jurisdictions, and potential solutions on how best to increase roaming agreements.

Thank you for your consideration,

Bill Magavern
Policy Director
Coalition for Clean Air

Gina Goodhill
Senior Director, Government Affairs
Clean Power Alliance

Bena Chang
Director of Government & Legislative Affairs
Silicon Valley Clean Energy

Michael Callahan
Associate General Counsel, Policy
Marin Clean Energy

Kurt Johnson
Community Energy Resilience Director
The Climate Center