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MN8 Energy Comments on Charging Interoperability

Additional submitted attachment is included below.



December 22, 2023

California Energy Commission
1516 Ninth Street
Sacramento, CA, 95814
Docket No: 22-EVI-06

Re: CEC Staff Workshop on Electric Vehicle Charging Interoperability

MN8 Energy LLC (MN8) commends the California Energy Commission's (CEC) efforts to drive interoperability across the Electric Vehicle (EV) charging ecosystem. MN8 develops, owns, and operates renewable energy generation facilities, battery energy storage systems and EV charging stations. Today, we provide clean, affordable energy to over 200 world-class enterprise customers, with an operating fleet of approximately 3 GW of capacity spread across 28 US states. We are partnering with various customers, such as OEMs and fleet operators, to develop EV charging solutions with the goal of delivering a high-quality, reliable, and premium experience to EV drivers that will enable widespread EV adoption.

MN8 shares the CEC's vision for realizing charging interoperability and a seamless charging experience as a means of accelerating widespread EV adoption. MN8 appreciates the CEC's recognition of network roaming as a key component of an interoperable EV charging ecosystem that supports customers' ease of use and product choice and will lead to greater innovation and scalability. There are multiple ways for charging station operators (CSOs) and eMobility service providers (EMSPs) to establish interoperability via network roaming, including peer-to-peer arrangements and roaming "hubs". Allowing flexibility in network roaming configurations will be important in achieving interoperability that is resilient over time as the EV charging ecosystem evolves. We applaud the CEC's efforts to date and encourage its continued convening and consulting of industry and public stakeholders to facilitate further discussion and solicitation of feedback on the potential approaches to support network roaming across CSOs and EMSPs in California.

To realize roaming in practice, MN8 supports the use of Open Charge Point Interface (OCPI) as a non-proprietary, open-source communications protocol that is already widely implemented across industry. OCPI has already been established as a federal minimum standard under the National Electric Vehicle Infrastructure Program, and alignment across state and federal standards is important to ensure widespread implementation.

We reiterate our commitment to an EV charging future with broad interoperability, and we look forward to additional opportunities to work with the CEC in achieving this goal. Thank you for your leadership on this issue.

Thank you,

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