

**DOCKETED**

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*Comment Received From: Erika Myers*  
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## **CharIN Comments Interoperability Workshop**

*Additional submitted attachment is included below.*

CharIN Interface Initiative North America (CharIN)  
1300 I (Eye) St. NW Suite 400 E, Washington DC, 20005



December 22, 2023  
Docket 22-EVI-06  
California Energy Commission  
715 P Street  
Sacramento, CA 95814

**RE: Support for the Staff Workshop on Electric Vehicle Charging Interoperability**

Dear California Energy Commission,

On behalf of the members of the Charging Interface Initiative (CharIN)<sup>1</sup> North America, we commend California Energy Commission (CEC) Staff for evaluating electric vehicle (EV) charging interoperability in the recent Staff Workshop on EV Charging Interoperability. The CEC's proactivity on these important interoperability issues will help to create a more reliable and seamless network across the North American charging ecosystem.

We appreciate the Commission's attention to the important topic of interoperability. As EV adoption accelerates in California, the deployment of universal, reliable charging infrastructure is crucial. CharIN supports the Commission's broad interoperability vision that will shepherd the North American charging ecosystem towards a more seamless and connected future. We appreciate the Staff Workshop's exploration of interoperability challenges at all links in the charging experience. The consideration of each step in the charging process is a thoughtful and effective approach to addressing the common interoperability issues that lead to suboptimal customer experiences. Solving these issues is crucial to supporting accelerated EV adoption and meeting the state's zero-emission vehicle adoption targets.

CharIN supports interoperability standards that expand charging access while protecting the competitive charging market. Private market competition has shown its ability to accelerate the deployment of critical EV infrastructure. The CEC should support market competition by

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<sup>1</sup> CharIN is the largest global association focused on the electrification of all forms of transportation based on the seamless and interoperable charging experience enabled by the Combined Charging System (CCS) and the Megawatt Charging System (MCS). CCS and MCS are the global standards for charging vehicles of all kinds. An inclusive, industrywide coalition, CharIN represents nearly 300 leading e-mobility stakeholders, from automakers to utilities, grid operators, component suppliers, and charging station developers. Nearly 50 of these members are based in the United States. A complete list of members may be found on our website at [www.charin.global](http://www.charin.global).

implementing interoperability requirements in funding programs that allow EV charging providers to meet certain minimum conditions while continuing to innovate and improve customer experiences. The CEC should avoid mandating any specific roaming agreements in an effort to preserve private market innovations in EV charging.

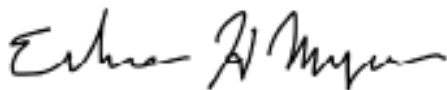
The correct implementation of open standards will ensure long-term interoperability and reliability. CharIN supports ISO15118 implementation and believes that conformance testing will foster growth throughout the broader e-mobility system.

Demand for interoperability and conformance testing is quickly outstripping the supply offered by CharIN's bi-annual testing events, which have been hosted for over seven years in North America and globally. As such, CharIN has launched a major campaign to establish between two to four permanent testing facilities within the next two years in North America that would provide the latest-and-greatest in EVSE hardware and software for any EV manufacturer to use year-round. Further, these sites would continue to host CharIN Festivals to encourage peer-to-peer learning, networking, and improvement of the charging experience through alignment among EV and EVSE engineering teams with the goal of improving the customer experience and reliability.

CharIN is currently evaluating private and public sources of funding for these facilities and intends to leverage state and federal grants where possible to reduce participant access fees. CharIN believes that all industry participants should have access to reliable and affordable testing to ensure products going to market are consumer-friendly and the public charging experience is flawless and simple. Our goal for the testing sites is to serve as a resource for the broader industry to advance our shared mutual goal of fully interoperable charging using open standards.

In conclusion, CharIN stands ready to collaborate with the CEC to advance the cause of interoperability in the EV charging ecosystem. We appreciate the CEC's consideration of interoperability in the Staff Workshop on EV Charging Interoperability. We look forward to collaborating on this topic to improve driver experiences and help achieve California's EV goals.

Sincerely,

A handwritten signature in black ink, appearing to read "Erika H. Myers". The signature is fluid and cursive, written in a professional style.

Erika H. Myers  
Executive Director  
CharIN North America  
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