

<b>DOCKETED</b>	
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<b>Project Title:</b>	Proposed SB 123 Rulemaking
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*Comment Received From: Noodoe  
Submitted On: 6/6/2024  
Docket Number: 24-TRAN-02*

**Noodoe Comment SB123 Workshop Docket No 24-TRAN-02**

*Additional submitted attachment is included below.*



June 4, 2024

California Energy Commission  
715 P Street  
Sacramento, CA 95814

Re: Docket No. 24-TRAN-02 – Workshop Presentation on Proposed EV Charger Standards under Senate Bill 123

Noodoe appreciates the collaborative manner in which California Energy Commission (CEC) is approaching its mandate to implement SB 123 and is pleased to submit our comments.

Noodoe is a total EV charging solutions service provider, specializing in the development of best-of-class proprietary operating system software, known as EV OS. Noodoe equips new and expanding EV charging solution providers (CSPs) with next-generation hardware and Noodoe's EV OS software, creating the best user experience possible for Noodoe's partners and their customers. In 2018, Noodoe's first North American charger was installed in California. With headquarters in the United States, Noodoe has expanded operations to 14 countries with over 6,000 networked chargers in operation.

SB123, signed into law July 10, 2023, changed payment options for electric vehicle charging stations by removing the mandate for credit card readers, requiring instead tap card readers and mobile phone payment options for level two chargers. It also required ISO 15118 or "Plug and Charge" for payments on DC fast chargers.

We believe SB123 got it right in removing the mandate to employ dedicated credit card readers.

#### Credit Card readers

- Add \$1,000+ cost to a charger
- Add complexity to the installation
- Add risk of consumer information theft
- Risk increased charger down time

With Noodoe's operating system, a dedicated app is not required, though available. Users can directly use their credit cards with Google Pay or Apple Pay as if they were using a credit card reader, but with greater ease and higher customer information security.

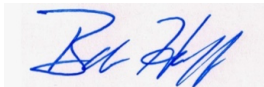
CEC

June 4, 2024

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In summary, as you explore and author new rules for EVSE, it is Noodoe's request, for the reasons mentioned above, that you do not re-instate the mandate for a credit card reader.

Sincerely,

A handwritten signature in blue ink, appearing to read "Bob Huff", is placed on a light gray rectangular background.

Senator Bob Huff (ret.)

Director, Government Affairs

A handwritten signature in blue ink, appearing to read "Szilard Murati", is placed on a light gray rectangular background.

Szilard Murati

Product Solutions & Compliance