

DOCKETED

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Plug In America Comments on Roaming Workshop

Additional submitted attachment is included below.



June 21, 2024

California Energy Commission
715 P St, Sacramento, CA 95814
Docket #: 22-EVI-06

Re: Workshop on Charging Network Roaming

Thank you for the opportunity to comment on the California Energy Commission workshop on charging network roaming on May 31, 2024.

Plug In America is a nonprofit organization with a mission to accelerate the transition to affordable and accessible plug-in vehicles and charging through education, advocacy, and research. We represent electric vehicle (EV) drivers across the country and leverage their real-world insights to achieve seamless, accessible, and reliable EV user experiences.

Firstly, we appreciate the CEC hosting the informational workshop on roaming to explore how roaming can benefit California's EV drivers, especially as the number of EVs on the road continues to increase rapidly. Roaming is a useful tool to improve the charging experience and provide seamless access to more charging locations. Eliminating the need for multiple apps and accounts can simplify the charging experience and enable drivers to utilize the app they feel most comfortable with.

We are in full support of roaming agreements and strongly support the CEC requiring more roaming agreements. We are currently supporting efforts in the California legislature to require that roaming agreements be established between EV industry companies. We appreciated the discussion on roaming implementation business models during the workshop and can understand the strengths and weaknesses outlined for both bilateral roaming agreements and hub-based agreements. As the industry is still growing, it may be premature to mandate a particular model. We encourage the CEC to remain flexible and partner with EV industry stakeholders to identify the best path forward for California's market. Additionally, we recommend that the CEC honor currently operational roaming agreements (e.g. Flo and ChargePoint have had a roaming agreement in place since 2018).

We respectfully ask that EV drivers continue to be centered in the conversation as the CEC evaluates roaming models. Already, EV drivers report concerns with the cost of charging being too high.¹ We seek to ensure that selected methods minimize any cost increases to the driver. Moving forward, we recommend the CEC consider using a cost-benefit analysis taking into account the EV driver in assessing different business model options.

¹ The Public Charging Experience Survey, Plug In America, <http://pluginamerica.org/wp-content/uploads/2024/05/2024.05-Q1-Quarterly-Survey-Public-Charging-.pdf>

Functionality for the driver is key to the success of completed roaming agreements. While drivers can benefit significantly from roaming agreements, roaming is not typically a well-understood concept for most drivers. Plug In America recommends that the CEC consider strategies or requirements for consumer education within the framework of roaming agreements to ensure that drivers are aware of the increased functionality and access to multiple EV charging networks via a single account. Additionally, while we understand that not every EV charging provider is poised to immediately execute roaming agreements, we ask that the CEC carefully consider how a fractured roaming ecosystem can negatively impact drivers. For example, in a hypothetical scenario, if only eight out of twelve EV charging providers establish roaming agreements, this lack of consistency can pose challenges and introduce consumer confusion if roaming is not available across all networks.

We look forward to continuing to engage on roaming moving forward to increase access to EV charging for drivers and simplify the charging experience. Thank you again for the opportunity to provide feedback and for your consideration of these comments. Please do not hesitate to reach out to Alexia Melendez Martineau, Senior Policy Manager, Plug In America at amartineau@pluginamerica.org with any questions or for further discussion.

Sincerely,

Joel Levin
Executive Director, Plug In America