

DOCKETED

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PowerFlex Comments_Network Roaming Workshop

Additional submitted attachment is included below.



June 21, 2024

California Energy Commission
Docket Unit, MS-4
715 P Street
Sacramento, CA 95814

Re: Docket No. 22-EVI-06—PowerFlex Comments on May 31, 2024, Workshop on Charging Network Roaming

California Energy Commissioners and Staff:

PowerFlex appreciates the opportunity to comment on the California Energy Commission's (Commission's) May 31, 2024, workshop on Charging Network Roaming (workshop). PowerFlex is a leading installer, owner, and operator of distributed energy resources (DERs) including electric vehicle supply equipment (EVSE). With more than 10,000 EVSE installed in California, PowerFlex has a deep understanding of customer experience and is very supportive of the Commission's efforts to investigate network roaming options. With this experience and perspective in mind, PowerFlex offers the following comments.

Network Roaming Testing

Developing test procedures will be an important step of implementing network roaming. As such, test procedures should be well documented and shared throughout the regulatory discovery phase. PowerFlex believes that an open, well-vetted regulatory and development process will result in test procedures that are beneficial to charging station operators and drivers. Moreover, whatever the final test procedures are, PowerFlex advocates for testing that can be completed remotely. This will significantly reduce the administrative time and costs of completing testing.

Network Roaming Providers and Certification

As a general principle, PowerFlex strongly contends that regulatory requirements should not be established to benefit any one specific company or group of companies. Open, competitive markets will generally result in the best products, services, and prices available to customers. As such, PowerFlex argues that neutral third parties that do not require annual membership subscriptions should oversee network roaming certification and verification. We recommend having an official certification process that is free and open source for any charging station operator or EMobility Service Provider to validate they are following regulations as written. Additionally, EVSE providers should be able to choose who to use as network roaming providers. PowerFlex believes that this will result in the best options and prices for EVSE providers and ultimately EV drivers.

PowerFlex appreciates the opportunity to provide these comments in response to the Commission's May 31, 2024, workshop and looks forward to collaborating with the Commission on this topic in the future. Respectfully,



Raghav Murali
Director, Policy and Government Affairs
Raghav.murali@powerflex.com
PowerFlex Inc.