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## **CalETC's Comments on Charging Network Roaming Workshop**

*Additional submitted attachment is included below.*



June 21, 2024

California Energy Commission  
California Department of Transportation  
Re: Docket No. 22-EVI-06

Submitted electronically to [https://efiling.energy.ca.gov/EComment/EComment.aspx?  
docketnumber=22-EVI-06](https://efiling.energy.ca.gov/EComment/EComment.aspx?docketnumber=22-EVI-06)

**Re: Staff Workshop on Charging Network Roaming**

The California Electric Transportation Coalition (CalETC) appreciates the opportunity to provide comments on the Staff Workshop on Charging Network Roaming (Workshop) held on May 31, 2024. CalETC would like to thank the CEC for all your hard work on developing the Workshop and commitment to expanding and easing access to reliable EV charging infrastructure across the state.

CalETC supports and advocates for the transition to a zero-emission transportation future to spur economic growth, fuel diversity and energy independence, contribute to clean air, and combat climate change. CalETC is a non-profit association committed to the successful introduction and large-scale deployment of all forms of electric transportation. Our Board of Directors includes representatives from: Los Angeles Department of Water and Power, Pacific Gas and Electric, Sacramento Municipal Utility District, San Diego Gas and Electric, Southern California Edison, Southern California Public Power Authority, and the Northern California Power Agency. In addition to electric utilities, our membership includes major automakers, manufacturers of zero-emission trucks and buses, electric vehicle charging providers, autonomous electric vehicle fleet operators, and other industry leaders supporting transportation electrification.

CalETC supports the CEC's principles on roaming to improve and simplify the charging experience, widen access to chargers, maintain flexibility and ease for the industry, and ensure innovation and competition. These principles come with a need to balance the advantages and disadvantages of different strategies to achieve widespread network roaming. At the Workshop we learned that both bilateral agreements and hubs are currently being used and companies view expanding roaming as an integral part of the EV industry's and individual company's success. Given the industry's motivation to expand roaming agreements, either bilateral or hub, CalETC would prefer to allow the free market to develop rather than a mandate that could potentially pick winners and losers.

If the CEC is inclined to initiate a regulation for roaming, CalETC recommends the CEC adopt roaming standards to require EV charging networks to increase roaming capabilities but without prescribing either bilateral or hub agreements. For example, the standard could require that EV charging networks must allow roaming with a set percentage of the total market and then increase that percentage over time. This would require EV charging networks to expand their roaming agreements through either bilateral or hub agreements, while maintaining a technology neutral

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approach. We recognize that there are a variety of different business models within the charging ecosystem, which creates different roaming needs and interests that need to be accommodated should the CEC decide to take action. CalETC encourages the CEC to continue to coordinate directly with EV charging providers to better understand roaming capabilities and limitations.

Thank you for your consideration of our comments. Please do not hesitate to contact me at [kristian@caletc.com](mailto:kristian@caletc.com) should you have any questions.

Kind regards,

A handwritten signature in blue ink, appearing to read 'K. Corby', with a long horizontal flourish extending to the right.

Kristian Corby, Deputy Executive Director  
California Electric Transportation Coalition