



Collaboratev, LLC
Post Montgomery Center | One Montgomery Street, Suite 2525 | San Francisco, CA 94104
collaboratev.com

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CALIFORNIA ENERGY COMMISSION
DOCKET 13-ALT-01
Electric Vehicle Supply Equipment (EVSE) Interoperability

PUBLIC COMMENTS for the Interoperability Workshop held August 15, 2013
Submitted by
Collaboratev
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Jason Wolf
Co-founder and CEO

Thank you for preparing and holding the Workshop on Interoperability Issues last week. We found the content and discussion that resulted offered the opportunity for a better understanding of the issues, for what consensus can be achieved soon, and the near-term steps that will be needed to overcome market impediments to the continued growth of Electric Vehicles in California, and the nation.

Collaboratev is an independent California based company that enables charge network interoperability (roaming), roaming transaction clearing amongst networks, and charge spot location and status data provision to OEM's and other consumer-facing companies. Collaboratev has a focused mission to allow every PEV driver to locate, and charge at any EV charging station and receive one bill, regardless of their chosen home network. Earlier this year, Collaboratev introduced a business-ready proposal to achieve that mission.

With the backdrop of the Governor's ZEV Action Plan recommendations of last year, and with the potential passage and signing of AB 454 this year, it is critically important that the State take timely and decisive steps to meet the industry and stakeholders efforts in this critical EV Public/Private cooperative enterprise.

Our principal concern is based on the needs of Electric Vehicle (EV) drivers, both the present, and especially the future EV buyers/drivers. It will be much more difficult to attract new EV buyers if they are not capable of roaming across the various EV charging networks in a particular region or of receiving consolidated and transparent billing for their monthly charging activity. If we do not respond to these important driver needs, the state's prior investments for vehicles, infrastructure, research and development are jeopardized and could result in a tentative market, and future investments will not be maximized to their full potential.



California has proactively and consistently driven the ZEV agenda and this leadership position is now paying off, with the state enjoying the highest rates of PEV adoption (25% of the US) and industry related business success (Tesla, ChargePoint and others) in the nation, and possibly the world!

Following the very productive CEC Interoperability Workshop last week, which discussed the Government's role in enabling EVSE interoperability among an inclusive array of EV stakeholders, it seems there is a clear role for Government in supporting the industry in solving the driver roaming impediment.

Collaboratev's recommendation to the California Energy Commission (CEC) is to move quickly to support the objectives required by the legislation and Governor's ZEV Action Plan, by:

- ***Issuing a competitive solicitation for an open national standards-based and industry-backed roaming clearinghouse***

We suggest that the CEC follow-through quickly with the competitive solicitation to select a market-based entity that will cost share the development and establishment of the necessary solution, with the state as its partner, to serve the uniquely sophisticated California and broader national market. Proceeding in this way assures that such a solution is technically achievable, cost-efficient, timely, consistent with industry standards and practices, and, as a platform, can evolve as industry advances the technologies into the future.¹

- ***Providing a funding mechanism for existing California EVSP companies to quickly adapt to the roaming standards***

We suggest that a 'set-aside' of funding within the CEC's next EV Infrastructure PON, for such cost-share support of EVSP and EVSE owners, would be the most timely and cost-efficient way to accomplish this necessary goal.²

Allowing more time to pass would surely jeopardize the timely achievement of the Governor's ZEV Action Plan goals, would increase costs of the solution and network upgrades over time as more retrofit work will be needed, and make it exceedingly more difficult to meet the requirements contained in SB 454 (roaming in place by 1/1/2015), which is expected to be passed and signed very soon.

¹ CEC has in the past and continues to assist the development of standards and certifications to overcome market impediments and barriers for alternative fuels and advanced vehicle technologies. Hydrogen dispensing standards and Biodiesel commercial fuel quality specifications are being addressed by the California Department of Food and Agriculture- Division of Measurement Standards, under a \$4 million sponsorship by CEC. CEC also sponsors and holds membership to the Plug-In Hybrid and Electric Vehicle (PHEV) Research Center (UC Davis), the California Fuel Cell Partnership, the California Plug-In Electric Vehicle Collaborative (PEVC), Next STEPS, UC Davis Institute of Transportation Studies, and the UC Irvine Institute of Transportation Studies (STREET Model).

² A reasonable 'set aside' amount of funding within the EV Infrastructure Solicitation would cost-share the change-out of existing charging RFID tags and software changes needed for roaming. Similar 'set asides' have been quite successful for School District CNG fueling facilities' refurbishment, upgrade and expansion, as well as Regional Planning grants for EV Readiness and Alternative Fuels Readiness. These are effective and expedient tools to address market impediments and barriers as they arise.



Overall, we felt that the Workshop was well received by the industry stakeholders and participants, fostered very helpful discussion of the critical issues of Interoperability, and set the stage for actions to address the needs expressed. Now is the time to move forward with 'steps of no regret', or we risk the continued and sustainable growth of this still uncertain market.

The EV market is poised now to overcome this and other challenges to not only sustain the momentum realized thus far, but steadily increase the sales and market share for EVs - further delay will not be our friend. Please set a decisive and meaningful course of action on this issue, and the industry will meet you halfway!

Thank you for your consideration of these requests, and we look forward to a continued, meaningful dialogue to assure California's transition to the Electric Vehicle future we all hope for.

Best Wishes,



Jason Wolf

cc.

Commissioner Janea Scott

Mr. Jim Bartridge, Advisor to Commissioner Scott

Ms. Leslie Baroody, EV Program Manager

Ms. Analisa Bevan, Chief, Sustainable Transportation Technology Branch

Ms. Elise Keddie, ARB EV Program Manger

Mr. Randall Winston, Governor's Office

Mr. Randy Roesser, Deputy, Fuels and Transportation Division

Mr. John Butler, Manager, Emerging Fuels and Technologies Office