HUBJECT

June 21, 2019

California Air Resources Board
1001 I Street
Sacramento, CA 95812

Re: Electric Vehicle Supply Equipment Standards - SB 454 Implementation

Dear Chair Nichols, Members of the California Air Resources Board, and Staff,

We appreciate the opportunity to provide comments and participate in the stakeholder process to implement SB 454: Electric Vehicle Stations Open Access Act. We are excited to help drive interoperability and increase EV charging access in California, which perfectly aligns with Hubject's vision of "seamless charging for everyone, everywhere." We strongly believe open access to EV charging will help drive achievement of five million ZEVs on California's roads by 2030.

A major barrier to mass adoption of electric vehicles is consumer anxiety about adequate access to public charging stations and the current complexity of multiple membership requirements. While the number of EV chargers deployed is growing rapidly in California, they are managed by different operators, each with their own registration, mapping and access methods, thereby rendering one operator's chargers inaccessible to the customers registered with another operator. This fragmentation requires EV drivers to register and manage several memberships to access chargers with multiple RFID cards and mobile apps.

Hubject was founded in 2012 to solve this exact barrier and enable seamless interoperability between charging networks and electric vehicle service providers to drive EV adoption. EV drivers connected by the intercharge platform have seamless access to any charger through comprehensive station maps and real-time station status, as well as easy activation and billing using the driver's preferred charging provider card or app. The platform uses a communication protocol called the Open Intercharge Protocol (OICP) to enable easy and cost-effective connections with one interface providing station location, pricing, access and billing across all vehicle charging ecosystem—including utilities, automotive manufacturers, and charging operators. OICP connects over 100,000 charging ports in more than 26 countries and is the most widely adopted interoperability platform in the world. OICP is inclusive of all market participants regardless of the size of the network or number of charge ports.

Over the past several months, we have been working with ARB staff on the Interoperable Billing Standards portion of the SB 454 implementation. We are thankful that staff are recommending allowing the use of multiple interoperability protocols in California, including OICP, and we understand that ARB staff is proposing to require the installation of a different protocol, Open Charge Point Interface (OCPI) because it was the only freely available protocol for market use at the time.

Fortunately, we are very proud to share that OICP has recently been made freely available and open source. Now the most widely-used and secure protocol, OICP is now a static, free, and publicly available to use for either hub-based or peer-to-peer network interoperability connections.

We greatly appreciate the opportunity to provide comments and feedback on the Staff Report: Initial Statement of Reasons (ISOR) for Electric Vehicle Supply Equipment (EVSE) Standards. Below are our key comments:

- Per the ISOR, "staff will continue to track… and consider additional protocols if warranted" (pg. 31). With the opening of OICP, we respectfully request the California Air Resources Board re-consider OICP before a specific protocol is selected and required for all charging stations.

- To carryout the intent and spirit of SB 454 to enable true interoperability, we recommend that the regulation require interoperability agreements and include reporting requirements for all charging sessions using the roaming protocol. Simply requiring an interoperability protocol to be installed will not ensure that it will be used. Without requiring interoperability agreements and reporting, the installed interoperability protocol will simply "check a box" and fail to achieve or validate actual interoperability and its associated benefits to customers.

- We recognize that ARB is proposing to require OCPI installed on each EVSE and appreciate inclusion of regulatory language that does specify that other interoperable billing standards may be used, in addition to OCPI, and hope staff will continue to consider and assess alternatives as the regulation is implemented and technology progresses.

We greatly appreciate the opportunity to work with ARB on the implementation of SB 454. We are glad to provide any additional information and respond to follow up questions, as this is our top priority.

Sincerely,

Paul M. Glenney
CEO
Hubject Inc.