Mr. Tim Elliott  
Washington State Dept. of Agriculture  
PO Box 42560  
Olympia, WA  

Re: FLO Comments on SB 5192 Implementation – Interoperability Standards

Dear Mr. Elliott,

Thank you for the opportunity to comment on Washington State Department of Agriculture’s (WSDA) rulemaking process for SB 5192 (2021-22). We submit the following comments for WSDA’s consideration regarding the workshop it held September 22 to discuss interoperability standards for EV supply equipment.

FLO is a leading North American charging network for EVs and a major provider of smart charging software and equipment. FLO offers public, commercial, and residential chargers, including Level 2 EV supply equipment and DC fast chargers. In North America, FLO has deployed over 50,000 charging stations and manages hundreds of thousands of unique charging experiences that transfer 5.5 GWH of energy monthly. FLO’s headquarters and network operations are based in Quebec City.

I. Roaming & Billing Interoperability – OCPI

We respectfully recommend WSDA require EV charging networks to adopt “OCPI version 2.1.1 or later”, as this will ultimately achieve the foundational goal of roaming interoperability, while allowing flexibility to charging networks to use the version best suited to their customer’s needs.

Part of SB 5192’s intent with “interoperability” was to facilitate a simple and seamless consumer experience between charging networks, thus increasing station “accessibility” as called out in of SB 51921. Instead of consumers downloading multiple mobile applications to use across networks, or having to maintain several different tap cards, they could use one application or one tap card to access all charging networks. OCPI version 2.1.1 fulfills this exact purpose, and many charging networks have already implemented it.

OCPI version 2.2 goes beyond this foundation of roaming interoperability and provides additional services that in our view are not reasonably required to achieve the stated requirements of SB 5192. Requiring networks to implement OCPI v.2.2 will incur costs and will divert resources and staff efforts already dedicated to other software and hardware

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1 SB 5192 – Page 9, Section 6, Line 5.
development objectives and compliance activities without meaningfully furthering achievement of the objectives of SB 5192. Furthermore, OCPI version 3.0 could be released as early as this year, meaning that version 2.2 may not be the most recent version of the standard.

FLO encourages WSDA to require version 2.1.1 as a baseline, with allowance to use more recent versions, and then revisit this policy in future regulatory proceedings to decide if it is appropriate to require a newer version to further the express requirements of SB 5192 or other subsequent regulations.

FLO notes additionally that WSDA raised the question in its workshop of “certified” versus “compliant”, and to our knowledge a 3rd party certification process for OCPI does not currently exist, therefore charging networks can only be “compliant” at this time.

II. Software-Hardware Interoperability – OCPP

Like the approach recommended for OCPI, we respectfully recommend WSDA require companies to adopt “OCPP version 1.6J or later”. We support the goal of creating software and hardware interoperability so that critical EV charging assets are not stranded. Given Washington’s currently limited infrastructure, we cannot afford to strand investments and leave EV drivers with fewer charging options. We believe requiring OCPP 1.6J as a baseline will achieve this foundational goal of software and hardware interoperability to create a “competitive market” for EV charging stations and is consistent with the version many charging networks have already adopted. We also support allowing charging networks to use later versions, providing needed flexibility for continued innovation and improving services to site hosts and drivers.

While there are new versions of OCPP available, and even newer versions soon to be released, OCPP 1.6J is the only version that has a process for 3rd party certification. The Open Charge Alliance’s website for version 2.0.1 says the testing tool for 3rd party certification is “coming soon”. Even if it were to be released soon, like any new certification process, there will be substantial time required before implementation challenges are resolved and enough products are certified. Therefore, requiring version 1.6J is the only way currently to obtain third party validation of software and hardware interoperability.

Thank you for your consideration,

[electronically submitted]

Cory Bullis
Senior Public Affairs Specialist – U.S.
FLO

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2 SB 5192 – Page 9, Section 6, Line 5.
3 OCPP 2.0.1 Certification, OCPP 1.6 Certification, Home - Open Charge Alliance