The Open Charge Alliance (OCA) is a global consortium of public and private Electric Vehicle (EV) infrastructure leaders. Our mission is to foster global development, adoption, and compliance of communication protocols in the EV charging infrastructure and related standards through collaboration, education, testing, and certification. On behalf of a growing community of developers, start-ups, OEM’s and a much wider variety of experts in the field of electric mobility and (smart) charging infrastructure, we would like to offer some feedback in response to the January 27, 2021 email notice by the Washington State Department of Agriculture (WSDA) requesting input on its revised draft rule language related to electric vehicle supply equipment. The OCA is impressed with the thoughtful approach of WSDA regarding interoperability, and we are pleased to share what we believe is important and relevant information for your decision-making.

As a non-profit alliance, the OCA is a staunch supporter of open standards, processes and products. We believe that open and universally-applicable technology is the driving force behind the transition to electric mobility. To make it a success, every electric vehicle should be able to connect to every type of charging station, and every charging station should be able to connect to every charging network. And in turn, all components and all actors in the charging ecosystem should be able to communicate freely, using a common open and royalty-free protocol.

That open protocol is called the Open Charge Point Protocol (OCPP) and is developed by the OCA and its members since 2010. Now in 2022, it has evolved into the market standard and is being implemented in countries on almost every continent of the world. The strength of this protocol, which makes it possible to share data between the EV, Charging Station and Charging Management System, lies in the fact that it is accessible to anyone who wants to participate in this new and exciting field. The community of OCA members and OCPP implementers consists of technical researchers, start-ups, scale-ups and multinationals. This is illustrated by our U.S. members ranging from ChargePoint and Stellantis (formerly Fiat-Chrysler Automobiles) to newcomers like Noodoe Inc. and ZEF Energy.

No commercial party should claim the market for itself or raise the threshold for participation. Everyone involved, big or small, old or new, shares the same market, and innovation is the leading incentive for competition. The common goal is to develop thriving markets for EV and charging related products and services and to the accelerate the transition to e-mobility. Not using OCPP results in systems not being interoperable, increasing stranded asset risk, raising technical barriers for newcomers, impeding competition and harming consumers and consumer choice.

One of the OCA’s main contributions to keep the market open for innovation - while also protecting the quality of the OCPP-standard - is testing OCPP conformance of implementations and helping
other organizations to test. These tests take place in several contexts, for instance during live Plugfests in which companies from all over the world come together (currently online) to test their implementation with others one-on-one. All testing during these Plugfests is free of charge and available for anyone with a working implementation. Members of the OCA and non-members can join and exchange their findings.

Another way OCA supports this open EV charging ecosystem is by supporting companies and the market towards certifying OCPP implementations as to guarantee stakeholders and customers that their OCPP implementation complies with the standard. For OCPP 1.6 there already is a successful certification program in place since 2019. In the second half of this year the certification program for OCPP 2.0.1 will start. This version is the latest OCPP version (released in 2020) and covers a wide range of enhancements such as advanced device monitoring, ISO15118 compatibility, extended Smart Charging functionalities and the extensibility of OCPP.

Five independent Testing Laboratories around the world can test implementations on conformance to the specifications. In the U.S. one Testing Laboratory is located in Sterling, Virginia and another is being established in Concord, California this year as a part of the Vehicle Grid Innovation Lab (ViGIL), initiated by the California Energy Commission (CEC). The network of OCPP testing laboratories around the world is robust and aligned with the geographies and locations where demand for testing and manufacturers and companies seeking testing are located. Should demand increase, or increase in other locations, OCA will correspondingly work to increase testing capacity in those areas.

With our experience and the knowledge we have gathered in the last twelve years of intensive and inclusive researching and testing of EV charging infrastructure, we urge you to establish third-party OCPP certification as the standard for facilitating charger-to-network communications in Washington. Specifically, we urge you to require third-party OCPP certification as a common, consistent and fair yardstick against which to measure compliance, and further require electric vehicle service providers (EVSPs) to not contractually or functionally lock consumers to any one network operator. While third-party OCPP certification can help ensure the technical ability for customers to switch networks and protect against stranded assets, this must be paired with functional and contractual assurances for consumers and site hosts to do the same.

We appreciate the reasoning to want to also allow for self-certification. This, however, would fail to achieve what we understand WSDA and the Washington Legislature intended around interrogability, as it would allow anyone to claim compliance without any backing or proof. It would also represent a significant departure from the manner in which governments ensure compliance to key protocols and standards. No jurisdiction we are familiar with, for example, allows for self-certification to safety standards, such as UL, or even Energy Star to use the example of an efficiency standard in the United States. Washington State would not be the first government to enact such a requirement around third-party OCPP certification. In fact, the Republic of Korea recently in 2021 required third-party OCPP certification of chargers in order to access public funding. Such a requirement is needed to support competition, interoperability, and to send appropriate and needed signals to the marketplace that have real effect towards their explicitly stated purpose.

The Open Charge Alliance and OCPP exist to avoid a fractured, proprietary EV charging ecosystem. We wholeheartedly believe that adopting OCPP will open up a market full of opportunities without unnecessary boundaries and create a fair and level playing field for competition and market
innovation. The OCA is more than willing to share our knowledge and advice on any subject relating to OCPP, open standards and open markets for the charging infrastructure of the future.

With kind regards,

Onoph Caron – Chairman of the board

Arnhem, 9-2-2022

**OCA**: Please visit us at [www.openchargealliance.org](http://www.openchargealliance.org). The Open Charge Alliance (OCA) consists of more than 250 active members (January 2022) of which (a.o.) the following are located in the U.S.: ampUp/NAD Grid Corp, Argonne National Laboratory, Car charging Inc. "Blink", Chargepoint Inc., Chargie LLC (PCS Energy), Control module / EVSE LLC, DemandQ, Enel (Electric motor werks), EV Connect, Inc., EVOKE Systems (Amzur), EV-Trail, FreeWire Technologies, Inc., Greenlots (Shell Group), Gridscape Solutions, HEVO Inc., Iotecha, Multiforce Systems Corporation, Noodoe Inc., NovaCharge, LLC., Semaconnect Inc., Stellantis (Fiat Chrysler Automobiles), Syntech Systems Inc. (Myfuelmaster), ZEF Energy Inc.

**OCPP**: The Open Charge Point Protocol is a free and open standard which can be downloaded, shared and optimized by OCA-members and non-members. OCPP is being implemented by thousands of companies, technicians and organisations in over 140 countries.