Hi Tim,

Plug In America just wanted to make a few comments in advance of tomorrow's meeting on 2SSB 5192 - Section 6 Interoperability standards. Please feel free to share these comments for the record if you choose to do so.

Thank you again for this opportunity to provide comments.

Best,
- Jay

Jay Friedland  
Senior Policy Advisor  
Plug In America  
jay@pluginamerica.org

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Stakeholder Name: Plug In America  
Contact Info: Jay Friedland, Senior Policy Advisor  
Type: Non-profit - EV advocacy

Questions answered below inline:

**Section 6 Specifics – Please provide input for the following areas:**

- What should we be trying to achieve?

  Support freedom of choice for both site hosts and consumers to allow the widest possible open access to EV charging, especially for underserved communities.

- Which national and international best practices/standards should we be considering aligning the rule with? OCPI? OCPP? Others? A combination of multiple standards?

  There are two key aspects to interoperability in the EVSE framework:
hardware/software network management and billing/roaming. Both of these need to be addressed, but basically the open standard around network management is OCPP (developed by the Open Charge Alliance) and the open standard for billing interoperability is OCPI, supported by the EV Roaming Foundation. Both of these are widely accepted in Europe but haven’t made as significant inroad in the US due to the dominance of a few EVSE network operators. OCPP ultimately gives site owners and hosts the ability to more easily swap out network operators, keeping the hardware investment intact. It also helps if a network operator goes into bankruptcy. OCPI facilitates financial transactions amongst multiple parties enabling multiparty roaming. Currently in the US almost all “roaming” occurs using bilateral agreements between EVSPs, which means that each contract is separately negotiated. The EVSP industry has attempted to create an industry-wide roaming standard multiple times (eg: ROEV) but were unsuccessful, hence the regulations were invoked in California. It is important to note that with credit card readers, roaming agreements become less important since everyone has access to the basic financial transaction platform. It is critical to note that “contactless credit/debit/prepaid” cards are still several years away from availability, so to serve equity and underserved communities, the most common denominator is still an EMV chip card.

- When selecting the standards that this rule will align with:
  - What version? Does a specific version need to be specified or can other requirements be used to meet this requirement and maintain flexibility?

    We would recommend using the latest possible versions of the standards one year prior to the implementation of the rule. Since the rule will exist for many years, there should be an option to have the baseline standard plus any future revisions as possible implementations.

- Considering that California has already adopted certain standards, what should we be considering regarding standards that may not align exactly with theirs?

    Again, our recommendation would be to align with the California standards and create a larger market for EVSE deployment which includes WA, CA, and a number of other states considering this kind of legislation.