



Wednesday, August 10, 2022

RE: Recommendations for robust EV charging data control standards

Dear Commissioner(s),

AmpUp is an electric vehicle (EV) software and networking provider. Together with our hardware and installation partners, we deliver reliable, easy-to-use, and affordable charging solutions to help consumers meet their transportation electrification needs and sustainability goals. We have deployed charging stations across the country for private and public properties including multi-unit dwellings, universities, businesses, cities, and utilities.

To support electrification transportation, utility companies have developed rebate and incentive programs that support the purchase and installation of EV charging station equipment. Many of these programs require vendor approval and qualification. Approved EV network providers have been called on by utilities to provide charging session data and usage reports to inform these utilities on energy usage associated with EVs. We believe that the necessary regulation ensuring data standardization and security in this sector is severely lacking. We are writing to encourage your Commission and related agencies to adopt and enforce data regulations that better support EV hardware and software vendors to ensure success of the utility incentive programs.

Areas Needing Improvement

- Utility companies currently do not force a robust data security standard for their approved EVSE and network provider vendors. SSL is a low standard in today's cybersecurity environment; thus, a higher threshold such as SOC 2 Type II should be required of vendors participating in these programs. This ensures the data vendors handle internally abides by high security standards, thus protecting customer data which may be provided to the utilities for compliance purposes. Consumer privacy and data security should be given a higher priority in program design.
- Approved vendors are not incentivized to provide session data in a timely manner. Since network providers like AmpUp serve up to hundreds of utilities with data requests on a quarterly basis, it is not feasible to serve each one within short deadlines set by the utilities. State and utility EV incentive programs are also not compensating vendors accordingly for this custom data preparation and formatting work. Per the data requirement agreements signed between the utility and vendor, the utility has full discretion to remove the vendor from their approval list with no cause.
- Charging performance and usage data requirements across same state utilities do not align. Individual utility companies create their own data requirements, each different and sometimes more complex than the last. This, again, amounts to an enormous burden for participating vendors to comply with these data requirements.

Recommendations

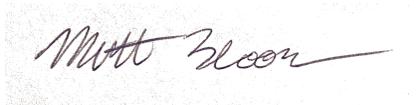
- All EVSE network operators and/or software providers should be at minimum SOC 2 Type II compliant for security purposes. The Commission should consider the utilities enforce a high security standard to protect customer data, especially the charger session meter

data.

- We urge the Commission to consider ensuring the utility vendors are compensated for data preparation, formatting, and compliance work required by the utilities. Additionally, data sharing agreements should be rewritten so vendors cannot be delisted from a utility program without cause, especially if they are already providing service to customers (the utility should want to continue meter data capture from existing sites).
- We strongly recommend the Commission consider utilities operating in the same state to use identical data reporting standards and report templates. These utilities should also align their report submission deadlines and allow for more reasonable timelines for data gathering, review, and submission.

We hope that our recommendations can help guide decisions made by your agency to protect consumers at this essential juncture in this new and growing industry. The development of standardized EV charging session performance and usage reporting benefits all stakeholders in the clean transportation arena, making critical data gathering and submission easier and more functional for participating vendors, utilities, regulators and, most importantly, consumers. Addressing these concerns at this time will support faster deployment of clean, sustainable energy. If we can provide additional insight or testimony on these issues or if you have questions on the EV industry in general, please do not hesitate to contact us. We thank you for your consideration and service.

Respectfully,

A handwritten signature in black ink that reads "Matt Bloom". The signature is written in a cursive, flowing style.

Matthew Bloom
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