



October 2, 2018

Texas Commission on Environmental Quality
Air Quality Division
P.O. Box 13087
Austin, TX 78711-3087

Re: Public Comment on Texas' VW Settlement Draft Beneficiary Mitigation Plan

Hubject Inc. appreciates the opportunity to provide input on Texas' VW Settlement Beneficiary Mitigation Plan.

Hubject Inc. commends the State of Texas and the Texas Commission on Environmental Quality (TCEQ) for its dedication to increasing electric vehicle (EV) adoption and the necessary EV charging infrastructure. Texas continues to exemplify its zero-emission vehicle (ZEV) leadership, especially through its Vehicle Purchase Incentive.

Hubject is an electric vehicle charging software platform that enables interoperability between EV charging networks. Hubject currently connects more than 80,000 charging ports and more than 350 B2B partners on 4 continents. Our vision is seamless EV charging for everyone, everywhere and we share the State's goal of increased EV adoption through reducing range anxiety and enhanced customer experience. As a neutral third-party, Hubject enables easy and convenient access and payment across charging networks for EV drivers by connecting all participants in the electric vehicle charging ecosystem including utilities, automotive manufacturers and electric vehicle service providers (EVSPs).

Hubject Inc. supports Texas' proposal to use the full 15% of the VW Mitigation funds on light-duty charging infrastructure. We encourage that the \$31.4 million be spent on EV public charging infrastructure in order to build out the needed EV charging station network in Texas, as it is fundamental in solving EV driver range anxiety.

In addition, moving forward, we respectfully encourage the inclusion of interoperability and all communications protocols related to interoperable access and billing (e.g. OICP, OCPI, etc.) for public EV charging stations. A major barrier to mass adoption of electric vehicles is consumer anxiety about adequate access to public charging stations and the inconvenience and complexity stemming from exclusive membership requirements currently imposed by multiple separate service providers. While the number of EV chargers deployed is growing rapidly, they are controlled and managed by different operators, each with their own registration, mapping and access method, thereby rendering one operator's chargers inaccessible to the drivers 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. Achieving seamless interoperability between EV charging operators, including locating, activating, and paying in a secure manner is needed to eliminate consumer concerns about accessibility and compatibility.



HUBJECT

Thank you for consideration; we look forward to continuing to work with the TCEQ to make EV charging easy and accessible for all through the addition of charging interoperability. Please feel free to contact me if you have any questions.

Sincerely,

Paul M. Glenney
CEO
Hsubject Inc.