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Ford Motor Company Comments on CEC Staff Report Tracking and Improving Reliability of California's EV Chargers

Additional submitted attachment is included below.



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August 11, 2025

Docket No. 22-EVI-04

California Energy Commission
715 P Street
Sacramento, CA 95814

Re: Ford Comments: *CEC Staff Report – Tracking and Improving Reliability of California’s Electric Vehicle Chargers* (June 27, 2025)

Ford Motor Company (Ford) thanks the staff and leadership at the California Energy Commission for considering these comments. This is a vital moment for the development of electric vehicle charging infrastructure, and we appreciate the Commission's ongoing commitment and engagement on such an important topic.

Ford is deeply committed to addressing the charging infrastructure challenges essential for the success of the EV transition. In addition to providing the BlueOval™ Charge Network for convenient public charging, and supporting our extensive dealer charging network Ford Charge, Ford Pro and Ford Pro Charging deliver hardware and software solutions to ensure fleet customers have reliable infrastructure to power their growing EV fleets. Ford supports the need for actions to improve charger reliability and remains actively engaged across the charging ecosystem to support reliability for our customers.

Ford understands that a growing, reliable, widespread, and accessible charging network is crucial for California to support the transition to electric vehicles. To that end, Ford offers the following feedback and recommendations for consideration:

I. Shift Reporting to Open Charge Point Interface (OCPI)

Ford appreciates the CEC’s intent to leverage established protocols for data reporting to assess and improve EV charger reliability. However, the current proposed use of Open Charge Point Protocol (OCPP) for defining charger downtime presents limitations that may not align with the ultimate goal of improving customer experience.

- a. **Limitations of OCPP-Based Reporting for Reliability Assessment:** While OCPP is a valuable protocol for managing charging stations, it is primarily designed to provide internal information for a Charge Point Operator (CPO). This leads to a disconnect with actual customer experience, as chargers may appear “online” based on OCPP metrics while being unable to provide a successful charging session. Such an internal focus limits its effectiveness in representing customer-facing experience, making it difficult for the CEC to analyze raw status data directly and verify the validity of reporting for customer-facing reliability.
- b. **Advantages of OCPI-Based Reporting:** Ford recommends that the CEC consider shifting the reporting mechanism from OCPP to Open Charge Point Interface (OCPI) for reliability data and is well-suited to provide data that directly correlates with the customer’s perspective on charger availability.
 - i. **Customer-Centric Reliability:** OCPI is designed to provide charger information and status to external parties, directly aligning reported data with the customer experience. This ensures uptime and downtime metrics genuinely reflect a charger’s ‘customer-ready’ status and its ability to dispense a charge. This accuracy directly incentivizes networks to prioritize real-world functionality.
 - ii. **Leverage Existing APIs:** OCPI leverages existing APIs (Application Programming Interfaces) within the EV charging ecosystem. This can reduce the operational overhead associated with data reporting, allowing networks to focus resources on improving real world reliability.
 - iii. **Enhanced Oversight:** OCPI enables CEC oversight of reporting and compliance more effectively. The CEC could cross-reference CPO OCPI feeds with publicly available information, enhancing the ability to audit and ensure the integrity of the reported data.

II. Recommended Refinement to Fleet Charger Definition

Ford greatly appreciates the California Energy Commission’s acknowledgement of the distinct, unique operational context of fleet charging. However, the proposed definition limiting “fleet chargers” to those “solely used to charge electric vehicles registered to the charging station operator” is too narrow and will mischaracterize the way many fleets actually operate. In various sectors including delivery and logistics, rental car agencies, or construction, fleet vehicles in businesses’ operations may be owned, leased, subcontracted, or partnered with other entities to ensure work is completed. In other words, a business may use or rely on vehicles registered separately from the entity that owns and operates the charger. An entity may have a charger where charging sessions are serving the fleets own operational needs, but under the current wording they would not be defined as a fleet charger and thus would be subject to the regulation’s requirements.

The proposed approach would compel fleet customers using non-publicly available chargers for their operations to meet requirements with additional administrative burden and cost with no commensurate reliability improvements in the publicly available charging network. These fleets already have powerful business incentives to keep chargers highly reliable. Lost charger

uptime means vehicle downtime, missed delivery windows, idle drivers, potential unfulfillment of contracts and agreements, and stranded capital, disrupting operations and eroding profitability.

Ford recommends CEC take an approach based on how the charger is used rather than the charging EV's registration matching the name on the charger's ownership documents. Focusing on the operational purpose would reflect the diversity of fleet structures and operations, while still separating publicly available charging infrastructure from equipment that is charging vehicles for a fleet's operations. To that aim, we recommend the following refinements to the fleet charger definition:

Definition	Original Proposed	Recommended Definition
Fleet Charger	A charger that is not publicly available, is not installed at a single-family residence or a multifamily dwelling, and is solely used to charge electric vehicles registered to the charging station operator.	A charger that is not publicly available, is not installed at a single-family residence or a multifamily dwelling, and is solely used by the charging station operator to charge electric vehicles used for work-related purposes.

III. Suggested Revisions to the Inventory Reporting

Ford acknowledges the California Energy Commission's statutory mandate to assess the adequacy of EV charging infrastructure for the state's adoption goals as outlined in AB 2127, SB 1000, and the IEPR statutes. We understand the need for a comprehensive understanding of the number and location of EV charging ports in California for effective infrastructure planning. The current proposed inventory reporting, however, will be a significant administrative and cost burden, especially when applied to private fleets whose chargers do not serve public drivers. There will be additional resources required to collect and assemble, legally review, and transmit the data which could ultimately slow, not accelerate, charger deployment. Ford recommends extending the fleet charger exemptions present in the regulation's requirements to the inventory requirement as well. Deploying adequate, affordable charging infrastructure in the commercial vehicle context is already challenging, with new reporting requirements deterring some customers from deciding to integrate increasing numbers of EVs for their businesses.

Additionally, the inventory reporting requirement demands data that the charging network provider in the role of recordkeeper and reporting agent may not have visibility into. In many cases, the network provider has no visibility into data fields that would be held between the installer and the customer. These items include fields such as whether the port was a replacement or the charger's status as to whether it received public or ratepayer funds in the form of incentives. Charging network providers in the role of recordkeeping and reporting agents under the regulation can only reliably relay what information is available to retain and report on. To this aim, we recommend adjusting the inventory reporting requirement to include language that requires reporting of the inventory information to the extent the requested identified data fields and information is available to the recordkeeping and reporting agent. Requiring extra steps to obtain information not residing with the charging network provider can lead to lengthened project timelines and repeated follow ups that expend resources and lead to slower overall deployment, a result all parties and stakeholders should aim to avoid at this time in the market when swifter customer deployments are paramount.

IV. Refining Uptime Calculation for Clarity & Accuracy

The calculation for charger uptime is a critical metric for assessing network reliability and increasing EV adoption. To ensure precise, consistent, and meaningful reporting, Ford recommends the following:

a. **Formula Notation for Unambiguous Calculation:**

CEC Draft Formula	Recommended Revision
$U = \frac{T - D + E}{T} * 100\%$	$U = \frac{(T - (D - E))}{T} * 100$

This revision removes potential ambiguities in the order of operations, preventing unintentional errors in implementation across various calculation platforms. Additionally, using * 100 instead of * 100% aligns with standard mathematical notation for expressing percentages, ensuring the formula yields a numerical percentage value.

b. **Clear Definition for Downtime:** Ford recommends clarifying § 3124(c) that “Operating Hours” be included in Total Downtime (*D*), or to ensure Excluded Downtimes (*E*) are treated as a subset of Total Downtime (*D*).

V. Clarifying the Moment Downtime Tracking Begins for a Nonfunctional Charger

Section 3124(c)(1)(D) defines when the clock starts for the downtime duration of a nonfunctional charger. Some of these include customer notification or methods by which the recordkeeping and reporting entity is “made aware” that a charger is nonfunctional. Ford recommends amending this to be when notice of the nonfunctional charger is “made known to, received, and acknowledged by” the recordkeeping and reporting entity. Reports that do not reach official channels, such as posts on social media, should not start the clock, because the responsible entity does not have adequate or timely information to respond to messages, relative to those received via recommended appropriate notification, escalation, or alert systems. This revision in this and other appropriate related sections defining when the downtime clock begins would better tie the metric to the responsible entity’s area of visibility and control.

VI. Clarifying funding and incentive applicability

Per the regulations, customers installing some chargers that take “public or ratepayer” funded incentives would be under the scope of the regulation’s requirements. Incentives in the market are important to drive EV adoption and grow supportive infrastructure. However, some customers, particularly smaller and medium-sized commercial customers, will be challenged to navigate the complexity of which incentives may be in scope under the regulations and the implications for their project. Given a broad patchwork of funding, these customers may not realize that an incentive of interest in California may trigger a new layer of compliance. To help customers and the broader market operating in California navigate this complexity, Ford recommends the agency publish a regularly updated web-based guidebook, or at minimum, a

concise reference sheet that lists the California incentives subject to the rule and explains or links to the regulatory compliance obligations. This information would give customers and the industry the necessary clarity to determine how to move forward with their charging project.

VII. Using OCPI Feeds for Access to Real-Time Status

Requiring an API to stream charger availability and accessibility data is technically possible but may increase costs to build and maintain an additional interface. A simpler alternative already in use by industry would be to let charging network providers share with CEC the same OCPI locations feed already available to PlugShare, the DOE AFDC database, and reporting for California Air Resources Board compliance. CEC would have access to view a charger's current status and changes, achieving the same transparency with tools industry has in practice today.

Ford is deeply committed to the success of California's clean transportation goals and continued build-out of a reliable, widespread, and accessible EV charging ecosystem. Ford looks forward to continued collaboration with the California Energy Commission to ensure regulations foster the expansion of EV charging infrastructure across the state.

Thank you again for your time and consideration. Please feel free to contact me or Jeanette Clute, Electrification, Charging and Energy Services Policy Manager, at 313-600-2597 or jclute@ford.com if Ford can provide any additional information or support.

Sincerely,

A handwritten signature in blue ink that reads "Cynthia Williams". The signature is written in a cursive, flowing style.

Cynthia Williams