

DOCKETED	
Docket Number:	22-EVI-04
Project Title:	Electric Vehicle Charging Infrastructure Reliability
TN #:	265529
Document Title:	Hyundai Motor North America Comments- Electric Vehicle Charging Infrastructure Reliability Proposed Rule
Description:	N/A
Filer:	System
Organization:	Hyundai Motor North America
Submitter Role:	Public
Submission Date:	8/11/2025 4:58:44 PM
Docketed Date:	8/11/2025

Comment Received From: Hyundai Motor North America
Submitted On: 8/11/2025
Docket Number: 22-EVI-04

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Hyundai appreciates the opportunity to comment on the California Energy Commission's Electric Vehicle Charging Infrastructure Reliability Proposed Rule. Our comments are attached.

Additional submitted attachment is included below.

August 11, 2025

California Energy Commission
715 P Street
Sacramento, CA 95814

**RE: Hyundai's Comments to California Energy Commission's Electric Vehicle
Charging Infrastructure Reliability Proposed Rule, Docket # 22-EVI-04**

To Whom it May Concern:

Hyundai Motor North America ("Hyundai") appreciates the opportunity to comment on the California Energy Commission's ("CEC") Electric Vehicle Charging Infrastructure Reliability Proposed Rule published on June 27, 2025. We commend CEC for developing a comprehensive regulation to improve public charging and strongly believe it is more important than ever to improve charger reliability, especially as we progress towards capturing the early majority electric vehicle ("EV") consumers.

Hyundai offers a diverse line up of quality and affordable vehicles which include battery, plug-in hybrid, hybrid, and fuel-cell electric as well as internal combustion engines. We are committed to innovative initiatives that propel the electrification transition forward. We have invested \$12.6 billion to build a brand new dedicated EV factory, which opened October 2024, and two battery plant joint ventures in Georgia¹. We are a proud member of IONNA², the joint venture of eight automakers to build out more than 30,000 chargers nationwide. We will continue to pursue creative solutions to spur EV adoption among the early majority buyers

We share a common goal with CEC to improve charging reliability. Of the several enablers necessary to attract more California customers to EVs, charging reliability is a top priority. In 2024, California EV sales data suggest a potential, hovering at 23 percent. California must reenact EV forward policies that prevent an adoption slowdown. For example, light-duty purchase incentives such as Clean Vehicle Rebate Program ("CVRP") and Clean Fuel Rewards ("CFR") have been eliminated. This plus the lack of reliable charging continues to be among the primary deterrents to EV adoption. In fact, Hyundai's 2023 IONIQ 6 early buyer research shows that 39% of early buyers were dissatisfied with their charging experience, driven by broken/unreliable chargers, unmaintained charging stations, and crowded/not enough stations among other concerns. This

¹ See Press Release, Hyundai Media Center, Hyundai Motor Group Metaplant America Celebrates Grand Opening, Powering U.S. Economic Growth (March 26, 2025), <https://www.hyundainews.com/en-us/releases/4407>.

² See ionna.com.

represents a significant increase in customer dissatisfaction with charging experience compared to our IONIQ 5 early buyer research which showed 22% dissatisfaction. Additionally, a well-respected data analytics firm, Escalent conducted multiple nationwide studies.³ The results show that 27% of BEV owners have a worse than expected experience with public charging reliability, and 41% of EV owners, EV intenders, EV open and those resistance to EVs are concerned about charger reliability.⁴ Furthermore, 87% of EV intenders want real time status of the number of working chargers.⁵ The concerns around charger reliability are real and have a material impact on decision-making when considering an EV. Growth in the infrastructure network combined with true charger reliability are key areas of opportunity for the state as it prepares for the future Advanced Clean Cars III rulemaking. If California can get infrastructure right, it lays the foundation California's regulatory framework going forward.

Equally important to complement this proposed regulation is continued investments by the state into all facets of the electrification transition. This includes EV and charging purchase incentives, adequate number of charging stations, strategically placed L2 and DC fast chargers, resilient grid, focused education, and financial assistance for priority communities.

In closing, CEC has developed a regulation that will be an asset to achieving California's overarching emissions reduction goals. Thank you.

Sincerely,



Olabisi Boyle
Senior Vice President, Product Planning & Mobility Strategy
Hyundai Motor North America

³ Escalent's EVForward nationwide study included individuals who were 18-80 years of age, have a 2019 model year or newer vehicle and intend to purchase another vehicle within 5 years. It included current EV owners, EV intenders, EV open, and EV resistant.

⁴ Escalent EVForward study: Predicting the next generation of EV buyers just got real. 2025 U.S. Core Study. Page 12 and 45.

⁵ Escalent EVForward study: Predicting the next generation of EV buyers just got real. 2024 Charging Experience DeepDive. Page 42