DOCKETED	
Docket Number:	22-EVI-04
Project Title:	Electric Vehicle Charging Infrastructure Reliability
TN #:	265551
Document Title:	IREC Comments on Proposed EV Charger Inventory Data Reporting Regulations
Description:	N/A
Filer:	System
Organization:	Interstate Renewable Energy Council
Submitter Role:	Public
Submission Date:	8/12/2025 2:32:39 PM
Docketed Date:	8/12/2025

Comment Received From: Interstate Renewable Energy Council
Submitted On: 8/12/2025
Docket Number: 22-EVI-04

IREC Comments on Proposed EV Charger Inventory Data Reporting Regulations

Additional submitted attachment is included below.

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INTERSTATE RENEWABLE ENERGY COUNCIL

August 12, 2025

VIA ELECTRONIC FILING

California Energy Commission
Docket Unit, MS-4
715 P Street
Sacramento, California 95814

Re: 22-EVI-04: Rulemaking to Establish Regulations for Improved EV Charger Recordkeeping and Reporting, Reliability, and Data Sharing

Dear Commissioners and Staff of the California Energy Commission,

Enclosed please find the comments of the Interstate Renewable Energy Council (IREC) in the above-captioned docket on the California Energy Commission's (CEC) Notice of Proposed Action filed on June 27, 2025 and associated proposed regulations. If you have any questions regarding this filing, please do not hesitate to contact the undersigned.

Sincerely,

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INTERSTATE RENEWABLE ENERGY COUNCIL

COMMENTS OF THE INTERSTATE RENEWABLE ENERGY COUNCIL, INC. ON THE CEC RULEMAKING TO ESTABLISH REGULATIONS FOR IMPROVED EV CHARGER RECORDKEEPING AND REPORTING, RELIABILITY, AND DATA SHARING

Pursuant to the California Energy Commission's (CEC) Notice of Proposed Action filed on June 27, 2025 under the *Rulemaking to Establish Regulations for Improved EV Charger Recordkeeping and Reporting, Reliability, and Data Sharing* (Docket 22-EVI-04), the Interstate Renewable Energy Council, Inc. (IREC) respectfully submits the following comments.

Introduction

IREC is a 501(c)(3) non-partisan, non-profit organization working nationally to increase consumer access to sustainable energy and energy efficiency through independent, fact-based policy leadership, quality workforce development, and consumer empowerment. IREC's mission is to build the foundation for rapid adoption of clean energy and energy efficiency to benefit people, the economy, and the planet. In service of that mission, IREC works to increase the adoption of policies and regulatory reforms that expand access to and streamline the interconnection of new clean energy resources and accelerate transportation electrification through efficient and transparent energization processes.

IREC has participated actively in the California Public Utilities Commission's (CPUC's) Rulemaking to Establish Energization Timelines (R.24-01-018[1]) and proposed a "pace of energization" framework to assess whether electric vehicle (EV) infrastructure deployment is on track to meet the state's decarbonization goals.[2] Understanding the current pace of energization is critical to determining whether California's recently adopted timelines in R.24-01-018 are sufficiently ambitious to achieve the state's climate policy objectives.

IREC commends the CEC for advancing strong requirements for inventory reporting. This data will improve visibility into the state's charging infrastructure and provides a good basis for a future pace of energization study. However, our review of the proposed regulations contained in

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[1] CA Pub. Util. Comm., Dkt. R.24-01-018, *Rulemaking to Establish Energization Timelines* (Jan. 2024).

[2] CPUC, Dkt. R.24-01-018, *Opening Comments of the Interstate Renewable Energy Council, Inc. on the Proposed Decision Establishing Target Energization Time Periods and Procedures for Customers to Report Energization Delays*, p. 15 (Aug. 29, 2024). See also: Matthew McKerley, *Charging Ahead on California's EV Goals*, Public Utilities Fortnightly (July 2025), https://www.fortnightly.com/fortnightly/2025/07/charging-ahead-californias-ev-goals?authkey=2236bc9fa14ad137ff8d8787ce48e03a7bd4beb6f50696a3a7d97eac62b30bd7 (accessed 08/11/25).

Appendix A of the *Staff Report – Tracking and Improving Reliability of California's Electric Vehicle Chargers* reveals key topic areas to consider to fully enable comprehensive tracking that can inform effective regulatory oversight and planning.

In these comments, IREC offers three recommendations to strengthen the CEC's data collection efforts.

Recommendation #1: Consider Other Ways to Improve Accuracy of Shared-Private and Private Residential Charger Counts

While the proposed rules capture publicly- or ratepayer-funded shared-private chargers, the *Staff Report* acknowledges that large segments of the market—particularly shared-private and private residential chargers that do not receive public funding—remain excluded. These make up a significant proportion of Level 1 and Level 2 infrastructure and are important for understanding the overall charging ecosystem and assessing future needs.

To address this, IREC recommends that the CEC:

1. Develop a mechanism to improve accuracy of counts for shared-private chargers at workplaces, multifamily dwellings, and fleet depots. For example, the CEC could work with a third party to conduct a more comprehensive survey of charger developers or operators annually. Alternatively, the CEC could coordinate with electric utilities or the CPUC to solicit aggregated data on installed chargers.
2. Establish a process to estimate private residential charger deployment at single-family homes and small multifamily dwellings. Similar to shared-private chargers, the CEC could consider a more robust survey or collaborate more closely with utilities to identify data sharing opportunities to fill this data gap.

Recommendation #2: Coordinate with Regulated Utilities to Enable Regular Pace of Energization Analyses

As mentioned above, a pace of energization study could offer insights into whether current policies are allowing the state to realize its electrification policy goals. With charger inventory data and forecasts of the infrastructure deployment necessary to meet charging needs, the CEC can determine the number of chargers online, evaluate trends over time, and compare actual and forecasted deployment.

One other important data point is how quickly EV charger projects are being energized by utilities. In the Energization Timelines docket, the CPUC adopted biannual reporting requirements that utilities must submit containing numerous metrics related to energization projects, including project timeline data.[3] However, additional data would be required to align it

[3] CPUC, Dkt. R.24-01-018, *Decision 24-09-020*, Ordering Paragraphs 18-19, pp. 98-99 (Sept. 17, 2024).

with CEC datasets in order to assess whether EV infrastructure projects are progressing through the energization process quickly enough to meet projected EV infrastructure needs.

To address this, IREC recommends that the CEC:

1. Establish a data-sharing agreement with the state's regulated utilities to obtain the following data along with energization timelines: geographic location, number and type of chargers, and vehicle class served.
2. Compare CEC forecasts to utility timeline data to track and report on whether the current pace of energization is aligned with anticipated infrastructure needs.

RECOMMENDATION #3: Consider Whether Increased Data Reporting Frequency Would Help to Advance Timely Transportation Electrification Policies

The proposed regulations require semiannual charger inventory reporting. For pace of energization analyses, this cadence may hinder policymakers' ability to adopt timely course corrections and policy interventions.

To address this, IREC recommends that the CEC:

1. Evaluate the feasibility of increasing the frequency inventory data reporting, such as moving to quarterly reports. This assessment will need to take into account the capabilities of industry reporting systems and the ease of data submission, and it should also consider any additional tracking and reporting burdens that will impact CEC staff.

2. Assess whether the benefits of increased data reporting frequency outweigh the financial and administrative costs.

Conclusion

The proposed regulations will help to improve EV charger data tracking and reporting in California. However, to allow policymakers to evaluate whether current EV policies and accountability metrics will enable the state to achieve its clean transportation and climate objectives, the CEC should consider ways to improve data collection on unsubsidized private chargers, formalize coordination with utilities in the state for data sharing and analysis purposes, and determine whether more frequent reporting is necessary and cost effective.

IREC appreciates the CEC's efforts to improve data tracking and reporting to ensure California's charging infrastructure keeps pace with its clean transportation goals.