

<b>DOCKETED</b>	
<b>Docket Number:</b>	22-EVI-04
<b>Project Title:</b>	Electric Vehicle Charging Infrastructure Reliability
<b>TN #:</b>	265566
<b>Document Title:</b>	Zoox, Inc. Comments - Zoox Comments Regarding Docket 22-EVI-04
<b>Description:</b>	N/A
<b>Filer:</b>	System
<b>Organization:</b>	Zoox, Inc.
<b>Submitter Role:</b>	Public
<b>Submission Date:</b>	8/12/2025 4:10:42 PM
<b>Docketed Date:</b>	8/12/2025

*Comment Received From: Zoox, Inc.*  
*Submitted On: 8/12/2025*  
*Docket Number: 22-EVI-04*

## **Zoox Comments Regarding Docket 22-EVI-04**

*Additional submitted attachment is included below.*

August 12, 2025

**TO:**

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

**RE: Zook Comments Regarding Docket 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,

Thank you for the opportunity to comment on this rulemaking and for your continued efforts to both ensure that California remains the nation's leader in clean transportation and for fostering an environment in which revolutionary transportation technologies can thrive. Zook appreciates the California Energy Commission's ("CEC") efforts to increase the reliability and performance of public electric vehicle ("EV") charging infrastructure to increase consumer confidence in the technology.

We commend the CEC for recognizing the unique charging needs of EV fleets and proposing exclusions from uptime reporting and performance standards. Zook encourages the CEC to make minor updates to the definitions of "fleet charger" and "charging station operator" to better account for current and future business needs as EV fleet models, like Zook, continue to develop.

Based in Foster City, CA, Zook is reinventing personal transportation – building a safer, cleaner, and more enjoyable future on the road. At the core of its vision is a purpose-built robotaxi that offers the world a better way to ride. Through a combination of cutting-edge technology and a focus on the rider experience, Zook is transforming urban mobility with its comprehensive and cohesive autonomous ride-hailing service. Zook manufactures the all-electric robotaxis in our 210,000-square-foot facility in Hayward, California, and we own and operate the fleet in a ride-hailing service. Individual consumers or other entities cannot purchase our vehicles.

Zook currently operates primarily in urban environments, where land availability is often constrained and dedicated charging infrastructure can be limited. Developing charging options is crucial for optimizing an EV fleet business model in these areas, and we encourage the CEC to consider these evolving needs in its definition of a fleet charger.

As the Initial Statement of Reasons (ISOR) notes, “No acceptable definition of fleet charger or fleet was identified in state or federal law tailored to this specific purpose.”<sup>1</sup> Therefore, this rulemaking presents a unique opportunity to define “fleet chargers” in this context in California. Given the precedent this will establish, it is essential to consider a range of fleet charging scenarios.

Zoox proposes the following definitions, which would better consider situations where the EV is not registered to the charging station operator, such as in the case of a leased fleet of vehicles. These proposed definitions also encompass scenarios in which, for example, a fleet operator contracts a charging station operator to install and operate charging stations on its property for the fleet’s exclusive use.

**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 owned by, leased by, or operated at the direction of ~~registered to~~ the charging station operator, or, a charger that is not accessible without a preexisting contract or access agreement between the fleet company and the charging operator.*

**Charging station operator:** *The entity that owns or leases the charger and supporting equipment at one or more charging stations. Although this entity can delegate responsibility for certain aspects of charging station operation and maintenance to subcontractors, this entity retains responsibility for operation and maintenance of chargers and supporting equipment. The charging station operator and the charging network provider can be the same entity.*

In each of these scenarios, the reliability of the charging infrastructure is managed pursuant to private contracts and “has less public interest.”<sup>2</sup>

The Zoox ride-hailing service has the potential to significantly expand access to zero-emission transportation while also reducing congestion and tailpipe emissions in our cities, in line with the goals of Governor Gavin Newsom’s recent Executive Order (N-27-25). By avoiding a “one size fits all” approach and considering a broad range of fleet charging configurations, the CEC will encourage a broader range of EV deployments – like Zoox’s ride-hailing service – and will help keep California at the forefront of new, zero-emission transportation technologies and services.

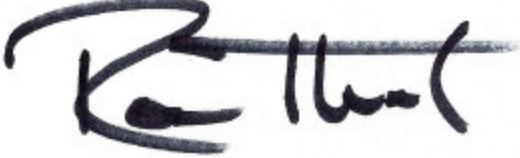
---

<sup>1</sup> ISOR - Rulemaking to Establish Regulations for Improved EV Charger Recordkeeping and Reporting, Reliability, and Data Sharing, pg. 13.

<sup>2</sup> Ibid.

Thank you again for your leadership and steadfast support for zero-emission transportation in California. We appreciate your consideration of our feedback and look forward to working together to realize the state's vision for a safer, cleaner, and more resilient transportation system.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Ron Thaniel', with a large, sweeping initial 'R'.

Ron Thaniel  
Senior Director, Policy & Regulatory Affairs  
Zoox