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Peninsula Clean Energy Comments on CEC's Proposed EV Charger Reliability Regulations

Additional submitted attachment is included below.

August 12, 2025

California Energy Commission
Docket Unit
715 P Street
Sacramento, CA 95814-5512
Docket@energy.ca.gov

RE: Docket No. 24-EVI-02 – Peninsula Clean Energy Authority Comments on Proposed Regulations for Improved Electric Vehicle Charger Recordkeeping and Reporting, Reliability, and Data Sharing

Dear Commissioners and Staff,

Peninsula Clean Energy Authority ("PCE") appreciates the opportunity to comment on the proposed regulations for electric vehicle supply equipment (EVSE) inventory reporting, reliability standards, and data sharing pursuant to Public Resources Code §§ 25229 and 25231.5. PCE agrees with Commission staff that if California is to achieve widespread electric vehicle (EV) adoption, California's public EVSE network must be robust and reliable. PCE commends Commission staff for the thorough stakeholder and engagement process before the final draft regulatory language was published on June 27, 2025. In particular, PCE appreciates that the final draft will not impose data collection and reporting requirements on multifamily chargers that are solely for private use and thereby will not create new unnecessary hurdles to expanding EV adoption among Californians that live in multifamily housing.

PCE is a Community Choice Aggregation (CCA) agency. It is the official electricity provider for San Mateo County and for the City of Los Banos. Founded in 2016 with a mission to reduce greenhouse gas emissions, the agency serves a population of 810,000 by providing more than 3,600 GWh of energy annually of electricity that is 50 percent renewable, 100 percent carbon-free, and at a lower cost than Pacific Gas and Electric ("PG&E"). Since its inception, PCE has saved its customers over $185,000,000 on their electric bills.[1]

PCE's EV Ready Program is an important element of PCE's mission to promote accessible and reliable EV charging infrastructure for our customers.[2] The Program consists of EV charging infrastructure incentives and free technical assistance for workplace and public charging sites and includes a particular focus on multifamily properties in order to expand at-home charging access for residents. To date, EV Ready has helped PCE customers install more than 2,000 chargers, with over two-thirds located in multifamily housing, and another 3,000 chargers in progress. Some of the largest multifamily EV charging projects in the nation are occurring currently in the EV Ready program. This includes the installation 92 chargers installed in East Palo

[1] "Peninsula Clean Energy Lowers 2025 Electric Generation Rates." Peninsula Clean Energy. https://www.peninsulacleanenergy.com/news-releases/peninsula-clean-energy-lowers-2025-electric-generation-rates/.

[2] "EV Ready Program." Peninsula Clean Energy. https://www.peninsulacleanenergy.com/business/rebates-offers-business/ev-ready-program/.

Alto, 144 chargers in Millbrae/Burlingame, and ~140 chargers in Daly City. PCE is currently working on one of the largest multifamily EV charging retrofit projects on the West Coast that, when completed, will result in more than 200 charging ports, one for every parking space at the property.

Deploying EV charging at scale in multifamily housing is essential for an equitable transition to EVs and achieving California's adoption goals. The CEC's 2024 Assembly Bill 2127 *Second Electric Vehicle Charging Infrastructure Assessment* estimates that California must install 313,000 new multifamily chargers by 2030 and another 264,000 by 2035 to meet the state EV adoption goals. This means that California must install roughly 48,000 multifamily chargers per year through 2035.[3]

PCE appreciates that the final proposed regulations strike the right balance between ensuring the growing network of EVSE meets drivers' needs and minimizing regulatory barriers to installing the number multifamily chargers needed to meet California's EV adoption goals. PCE is particularly supportive of defining "private residential chargers" in Table ES-1 to include multifamily chargers used solely for private use by a single resident. This definition will exempt these chargers from rules requiring inventory and reliability reporting. This outcome is reasonable as private multifamily chargers are functionally equivalent to private chargers in single-family homes due to their similar operational and usage characteristics. In both cases there is a small set of known users of the equipment and no public access. PCE therefore agrees that, as single family chargers are exempt from the reliability and inventory regulations, these same exemptions should be extended to privately used multifamily chargers.

This alignment is particularly important for non-networked multifamily chargers. In such cases, there is no charging network provider to serve as the default recordkeeping and reporting agent. Without the exemption, the reporting obligation would fall to the multifamily property owner or even the individual resident, depending on how the charger is metered and who is the utility customer of record. Such an outcome could create administrative burdens that would deter multifamily properties from pursuing EV charging projects for their residents.

Looking ahead, we encourage the CEC to continue engaging with local governments, CCAs, and EVSE providers to track implementation and address challenges. We appreciate the Commission's leadership in advancing California's EV infrastructure policy framework and look forward to continued collaboration.

Sincerely,

/s/ *Matthew Rutherford*
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[3] Davis, Adam, Tiffany Hoang, Thanh Lopez, Jeffrey Lu, Taylor Nguyen, Bob Nolty, Larry Rillera, Dustin Schell, Micah Wofford. 2023. Assembly Bill 2127 Second Electric Vehicle Charging Infrastructure Assessment: Assessing Charging Needs to Support Zero-Emission Vehicles in 2030 and 2035. *Figure 1 - Chargers Needed for Light-Duty Plug-In Electric Vehicles in 2030 and 2035*. Page 4. California Energy Commission. Publication Number: CEC-600-2024-00, available at: https://www.energy.ca.gov/publications/2024/assembly-bill-2127-second-electric-vehicle-charging-infrastructure-assessment.