

DOCKETED	
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Project Title:	Electric Vehicle Charging Infrastructure Reliability
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*Comment Received From: Coalition for Clean Air
Submitted On: 9/22/2025
Docket Number: 22-EVI-04*

**Coalition for Clean Air Comments in Support of Rulemaking to
Establish Regulations for Improved EV Charger Recordkeeping**

Additional submitted attachment is included below.



September 22, 2025

California Energy Commission
Docket Unit, MS-4
Re: Docket No. 22-EVI-04
715 P Street
Sacramento, CA 95814

Re: Coalition for Clean Air Comments in Support of Rulemaking to Establish Regulations for Improved EV Charger Recordkeeping and Reporting, Reliability, and Data Sharing

The Coalition for Clean Air welcomes the opportunity to provide comments on the California Energy Commission's (Energy Commission) proposed regulations regarding electric vehicle (EV) infrastructure reliability and reporting standards.

We strongly supported Assembly Bill 126 (Reyes, Chapter 319, Statutes of 2023), which amended Public Resources Code section 25231.5(d)(1) and directed the CEC to adopt tools to increase charging station uptime, including uptime requirements and operation and maintenance requirements. AB 126 also enacted Public Resources Code section 25231.5(d)(2), which requires the CEC to adopt standards requiring certain entities to notify customers about the availability and accessibility of publicly available EV charging ports.

Transportation is by far the largest source of air pollution and greenhouse gases in California. Fortunately, we have a broad and growing stable of electric vehicles that emit no tailpipe pollution and yield major reductions in emissions when the entire life-cycle is considered.

For transportation electrification to succeed, the refueling experience must be dependable and convenient. Drivers should be able to approach a public charging station – especially one that has been built with public funds -- with the same confidence with which they would drive into a gas station. Unfortunately, this is not always the case at present. Therefore, we support CEC's *Rulemaking to Establish Regulations for Improved Electric Vehicle Charger Recordkeeping and Reporting, Reliability, and Data Sharing*.

The proposed rule would track the number of EV charging ports installed in California by establishing inventory reporting requirements and require adopting reliability recordkeeping and reporting for publicly or ratepayer funded Direct Current Fast Charger (DCFC) ports. Most importantly, the rule would increase DCFC port uptime for publicly or ratepayer funded DCFC ports by setting reliability performance standards, including a 97 percent uptime standard. The

EV driver experience would benefit from sharing of real-time data on the availability and accessibility of publicly available charging infrastructure for publicly or ratepayer funded charging ports. Public funding of charging infrastructure should be accompanied by obligations to reliably serve customers and share data with the public.

Adoption of this rule will continue California's progress in EV deployment and smooth out one of the major obstacles to EV adoption for many drivers. It will reduce the time wasted by inoperable chargers and aid in the attainment of air quality and climate standards set by state laws and executive orders.

Therefore, we urge the Energy Commission to move expeditiously to adopt the proposed rule.

Respectfully,

A handwritten signature in cursive script that reads "Bill Magavern".

Bill Magavern
Policy Director