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Ford Motor Company Comments on 15 Day Changes CEC Charger Reliability Regulations

Additional submitted attachment is included below.



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World Headquarters

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September 23, 2025

Docket No. 22-EVI-04

California Energy Commission
715 P Street
Sacramento, CA 95814

Re: *Ford Comments on 15-Day Changes* (September 08, 2025)

Definition of Fleet Charger

Ford Motor Company ("Ford") appreciates the California Energy Commission's ("CEC") and staff's revisions to the proposed EV Charging Reliability regulations. Broadening the "fleet charger" definition with the additional changes in the version of September 8, 2025, more accurately reflects how fleets operate. While we appreciate these recent changes, we believe that there is still a remaining gap.

Specifically, a significant share of customer fleet vehicles would not be registered as "commercial vehicles" under California Vehicle Code § 260 used in the fleet charger definition. Such examples may include city-owned Ford Mustang Mach-Es, Ford e-Transit vans providing vanpool services, corporate sales and service Mach-Es, or similar light-duty EVs operating in similar functions. These non-commercially-registered fleet vehicles would be dispatched, maintained, and charged exclusively for work by chargers that are not open to the public, but the current fleet charger definition would not capture charging these vehicles as "fleet charging."

Ford respectfully recommends the following revisions to the fleet charger definition.

Definition	Recommended Definition (Changes in Bold)
Fleet Charger	(21) "Fleet charger" means a charger that is not publicly available, as defined in this section, is not installed at a single-family residence or a multifamily dwelling, as defined in this section, and either: (A) The charger is used solely to charge (i) commercial vehicles, as defined in Section 260 of the California Vehicle Code, registered to the charging station operator or their contractors or subcontractors, or

	<p>(ii) other vehicles that are owned, leased, controlled, or operated by the business, nonprofit, or governmental entity operating the chargers and where the chargers are used solely for company or commercial purposes, regardless of registration classification;</p> <p>or</p> <p>(B) The charger is used solely to charge commercial vehicles and the charger is not accessible to charge except for those with a preexisting contract or preexisting access agreement with the charging station operator that guarantees a minimum uptime during the period of the contract or access agreement.</p>
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Ford values the CEC's continued collaboration and stands ready to assist as staff and the CEC finalize the rule. Please feel free to contact me or Mark Polster, Ford Vehicle Environmental Regulatory Strategy Manager, at 313-283-3453 or mpolster@ford.com if Ford can provide any additional information or support.

Sincerely,



Cynthia Williams

Global Director, Vehicle Compliance