

DOCKETED	
Docket Number:	22-EVI-04
Project Title:	Electric Vehicle Charging Infrastructure Reliability
TN #:	266121
Document Title:	Zoox, Inc. Comments - Zoox Comments - 15-Day Changes - CEC Charging Reliability
Description:	N/A
Filer:	System
Organization:	Zoox, Inc.
Submitter Role:	Public
Submission Date:	9/24/2025 1:11:24 PM
Docketed Date:	9/24/2025

Comment Received From: Zoox, Inc.
Submitted On: 9/24/2025
Docket Number: 22-EVI-04

Zoxx Comments - 15-Day Changes - CEC Charging Reliability

Additional submitted attachment is included below.

September 24, 2025

TO:

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

RE: Zoox Comments Regarding Docket 22-EVI-04: Rulemaking to Establish Regulations for Improved EV Charger Recordkeeping and Reporting, Reliability, and Data Sharing – 15-Day Comment Period

Dear Commissioners and Staff of the California Energy Commission,

Thank you for the additional opportunity to comment on the newly proposed amendments to the Rulemaking to Establish Regulations for Improved Electric Vehicle Charger Recordkeeping. Zoox appreciates the California Energy Commission's ("CEC") updates to the definition of a "fleet charger." These changes demonstrate the CEC's commitment to the success of zero-emission vehicle ("ZEV") operations of all kinds in California and recognizes that ZEV fleets like Zoox's have unique charging needs compared to personally owned ZEVs.

While the updated definition would cover the fleet charging operations for many fleet operators and much of Zoox's own vehicle operations, we respectfully request a clarification or minor modifications to the CEC's new proposed definition to capture other common fleet charging configurations. In particular, the suggestions below recognize that not all vehicles used for business purposes are necessarily registered as commercial vehicles. In addition, not all fleet vehicles are registered to the charging station operator – some may be long-term leases, awaiting registration, etc., operated at the direction of the charging station operator. As written, there is ambiguity as to whether the charging of any one of these vehicles on a fleet charger would still meet the charger's "fleet" designation as it is not "registered to" the charging station operator or their contractors/subcontractors.

(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 vehicles for commercial use, as defined in section 260 of the California Vehicle Code, registered to or operated at the direction of the charging station operator or their contractors or subcontractors; or
- (B) The charger is used solely to charge vehicles for commercial vehicle uses and the charger is not accessible to charge except for those with a preexisting

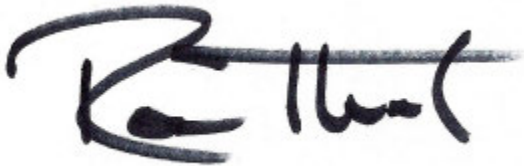
contract or preexisting access agreement with the charging station operator that guarantees a minimum uptime.

Again, we appreciate the recent modifications made to the “fleet charger” definition and your consideration of these additional changes to capture the scope of fleet charging models in the state. This rulemaking presents a unique opportunity to define “fleet chargers” in California regulations and establish a precedent for future guidance.

As noted in Zoox’s previous comments on this rulemaking, 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.

Thank you again for your leadership and steadfast support for zero-emission transportation in California. We appreciate your consideration of our additional 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 dark ink, appearing to read "Ron Thaniel", with a stylized flourish at the end.

Ron Thaniel
Senior Director, Policy & Regulatory Affairs
Zoox