

DOCKETED

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Comment from ad-hoc coalition of fleet charging providers

Please see the attached document for joint comments from Terawatt, Voltera, Forum Mobility, EV Realty, Zeem, and Highland Electric Fleets

Additional submitted attachment is included below.

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

September 24, 2025

Re: 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 follow-up on the 15 day changes made to the California Energy Commission's (CEC) Rulemaking to Establish Regulations for Improved EV Charger Recordkeeping and Reporting, Reliability, and Data Sharing, 22-EVI-04. We are writing to you today as an informal coalition of companies in the fleet vehicle charging sector, with our companies providing shared and private charging solutions to fleet customers across California. Our coalition previously submitted comments regarding the June 27, 2025 version of the proposed regulation offering amended language to the definition of "fleet charger" to broaden the fleet charging exemption to fleet-serving charging sites that ensure reliability, uptime, and positive customer experience by using a contract between a charging provider and its fleet customers. We greatly appreciate CEC Staff's consideration of this language and incorporation of the expanded definition of "fleet charger" in the September 8, 2025 update to the proposed regulation's language.

Our companies' business model of providing charging to fleet customers with access and reliability through a contract, often referred to as charging-as-a-service or shared charging, is a nascent but growing segment of the fleet charging industry. This market competition and fleets' ability to determine which contract terms are most consumer friendly, as well as charging providers' bottom-line commitment to high-levels of reliability and uptime to meet contract provisions, ensure that the interests of fleet consumers who elect to pursue this service offering are protected. By expanding the definition of "fleet charging" to include charging sites that only provide access to customers through the use of a contract, the CEC will deliver regulatorily-driven consumer protection at publicly accessible fleet charging sites without creating administrative and cost burdens on industry-leading solutions that exist to provide high levels of EV charging uptime to fleet users.

We look forward to continuing to collaborate with the CEC to realize our shared goals of a reliable, efficient, and cost-effective EV charging network for fleets, with a mix of public, shared, and private charging options meeting their commercial needs, and appreciate the CEC's leadership to ensure that California leads the United States in charging infrastructure reliability in addition to its number of deployments.

Sincerely,

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