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## **CalETC's Comments on the 15-Day Changes to the EVSE Reliability Regulation**

*Additional submitted attachment is included below.*



September 24, 2025

California Energy Commission

Re: Docket No. 22-EVI-04

715 P Street Sacramento, CA 95814

Submitted electronically to <https://efiling.energy.ca.gov/EComment/EComment.aspx?docketnumber=22-EVI-04>

Re: 15-Day Changes to the Regulations for Improved Electric Vehicle Charger Recordkeeping and Reporting, Reliability, and Data Sharing

The California Electric Transportation Coalition (CalEETC) appreciates the opportunity to provide comments on the 15-day changes to the Regulations for Improved Electric Vehicle (EV) Charger Recordkeeping and Reporting, Reliability, and Data Sharing (15-Day Changes). CalEETC would like to thank the CEC for all your hard work developing the proposed 15-Day Changes, and we support your commitment to meeting California's ZEV goals with reliable, ubiquitous, and accessible charging infrastructure.

CalEETC supports and advocates for the transition to a zero-emission transportation future to spur economic growth, fuel diversity and energy independence, contribute to clean air, and combat climate change. CalEETC is a non-profit association committed to the successful introduction and large-scale deployment of all forms of electric transportation. Our Board of Directors includes representatives from: Los Angeles Department of Water and Power, Pacific Gas and Electric, Sacramento Municipal Utility District, San Diego Gas and Electric, Southern California Edison, Southern California Public Power Authority, and the Northern California Power Agency. In addition to electric utilities, our membership includes major automakers, manufacturers of zero-emission trucks and buses, electric vehicle charging providers, and other industry leaders supporting transportation electrification.

CalEETC supports the proposed 15-Day Changes and would like to thank the CEC for their willingness to work with stakeholders on this important regulation. We support the changes to the "fleet charger" exemption and narrowing the definition of "incentive" in the 15-Day Changes. It has come to our attention that, like Low Carbon Fuel Carbon (LCFS) credits, publicly owned utilities receive allowances through the Cap-and-Trade program. Proceeds from these allowances can be used for charging infrastructure incentive programs. The proceeds are neither ratepayer funded nor received from state agencies. Therefore, we recommend the CEC clarify that the definition of "incentive" also excludes utility allowance proceeds from the Cap-and-Trade Program.

CalEETC also supports the extension of the limit for excluded downtime caused by theft or vandalism from 5 to 10 days. However, we continue to recommend increasing this amount to

45 days as the time to repair chargers simply cannot happen that fast. Charging companies must wait for responses from law enforcement and insurance companies before moving forward with repairs. Additionally, the availability of spare parts from suppliers continues to present challenges. Therefore, we believe it is reasonable to extend the amount of excluded downtime for theft or vandalism to 45 days.

Thank you for your consideration of our comments. Please do not hesitate to contact me at [kristian@caletc.com](mailto:kristian@caletc.com) should you have any questions.

Kind regards,

A handwritten signature in blue ink, appearing to read 'KAC', with a long horizontal flourish extending to the right.

Kristian Corby, Deputy Executive Director  
California Electric Transportation Coalition