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CALSTART Comments on Amended Express Terms

Additional submitted attachment is included below.



CALSTART, Inc.

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September 24, 2025

To: California Energy Commission

RE: EV Charging Infrastructure Reliability Amended Express Terms,
Docket: 22-EVI-04

CALSTART, headquartered in California, is a globally renowned organization dedicated to the advancement of zero emission vehicle and infrastructure technology. CALSTART is the administrator for block grant incentives on behalf of the California Energy Commission, including EnergIIZE Commercial Vehicles, Communities in Charge, and Zero Emission School Bus Infrastructure (ZESBI).

We appreciate the considerations the CEC incorporated into its amended Express Terms published to the docket on September 8, 2025 and the Questions and Answers published on September 17, 2025. We believe the changes to the definition of Fleet Chargers will provide greater clarity for fleets, shared charging operators, and the industry as a whole.

We would like to reiterate the two recommendations below to further define what is included in this regulation.

Establishing Thresholds in Defining DCFC

Section 3121 (13) defines “Direct current fast charger (DCFC)” as “a charger that enables rapid charging by delivering direct-current (DC) electricity to an EV’s battery”. Within the Staff Report, in Chapter 2 Background, there is an additional description showing that most commercial DCFC ports operate at 50-350 kW.

Minimum and maximum thresholds would help clarify “rapid charging”. The regulation may otherwise be unclear for low powered DC charging, which can supply similar or faster charging than Level 2 but wouldn’t be considered fast charging in the market, or for Megawatt Charging (MCS), which is a newer technology standard. Across funding programs, the definition of DCFC can otherwise vary –

with minimum thresholds usually between 50-100kW. MCS is not typically included in definitions of DCFC. EnergIIZE has seen substantial interest in low powered DC charging. This equipment is particularly useful where high powered charging is not possible or needed. This

clarification would also enable funding programs to more easily identify which funding recipients the regulation would cover.

CALSTART recommends establishing minimum and maximum thresholds in the regulatory language. CALSTART recommends inclusion of low powered DC charging in inventory reporting.

Clarification for Electric Off-Road Equipment (Non-EVSE)

Section 3121 (16) defines “Electric Vehicle (EV)” as “a vehicle that is otherwise partially or fully powered on electric power received from an external power source”. The regulation also excludes golf carts, electric bicycles, and other micromobility devices.

Section 3123 (b)(2)(N)(2) also includes a list of primary vehicle types, including light duty, medium duty, and heavy duty according to gross vehicle weight ratings (GVWR).

Off-road equipment is not classified into gross vehicle weight ratings, which is typically used for differentiating on-road vehicles. Funding for charging infrastructure for off-road equipment has been available under EnergIZE and the California CORE voucher program. Shared chargers can serve off-road equipment fleets in EnergIZE, such as for equipment located at a port which is not accessible to the public but is accessible to fleets.

Examples of electric off-road equipment available in the market can be found in the eligible equipment catalog in CORE, which differentiates size of equipment by its lift capacity and includes **port cargo-handling equipment, agricultural equipment, commercial harbor craft, transport refrigeration units, and other similar off-road equipment.**

To provide greater clarity, CALSTART would recommend excluding off-road equipment from the definition of “Electric Vehicle” similar to micromobility or separately defining “Electric off-road equipment” and specifying that off-road equipment could qualify under the Fleet Charger exemption.

Conclusion

CALSTART applauds the effort of the California Energy Commission to amend the Express Terms on EV charging infrastructure reliability. We appreciate the clarifications and adjustments made. We respectfully request that you reconsider the above recommendations for clarification on thresholds for DCFC and categorization of non-EVSE off-road equipment. It is essential that California has a reliable EV charging network, as it is vital to the state's transition to zero emission vehicles and towards achieving the state's climate goals.



Thank you for your time and attention.

Sincerely,

Darryl Little Jr.
State Policy Director
CALSTART, Inc.

Alyssa Haerle
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CALSTART, Inc.