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ChargePoint, Inc Comments

Additional submitted attachment is included below.



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September 24, 2025

California Energy Commission
Docket Unit
Docket No. 22-EVI-04
715 P Street, MS-4
Sacramento, CA 95814

RE: 15-day comments in Docket Number 22-EVI-04

ChargePoint thanks the CEC for the opportunity to provide comments on the changes proposed on September 8, 2025 in filing TN265912.

§3123

ChargePoint is a hardware and charging network provider; with very few exceptions, it does not own and operate charging equipment. This is the basis for our comments on several requirements in §3123, as described below, which place requirements for submitting data to the CEC that ChargePoint and similar charging networks simply do not have.

Public/ratepayer funding fields:

- **Is_publicly_funded**
- **Is_ratepayer_funded**

ChargePoint does not know which chargers were publicly or ratepayer funded. To enable this reporting, CEC needs to provide network providers with a list of charging equipment serial numbers that were publicly/ratepayer funded, along with a designation of whether each serial number was publicly funded, ratepayer funded, or both. The need for CEC or the entities that have provided funding to chargers is critical to the entire success of this regulation. In previous comments ChargePoint has provided additional thoughts on

Charging funding recipient fields:

- **Charging_funding_recipient**

ChargePoint maintains a business relationship with the charging station operator but does not know which entity received funding, in many instances they could be separate entities.

Privately funded field:

- **Is_privately_funded**

ChargePoint does not know which chargers were funded in part by private funding. Furthermore, this field provides little value as an installation that leveraged only \$1 in private funding would report the same value ("TRUE") as an installation that was 100% privately funded, and there are no reporting requirements tied to this value. ChargePoint

recommends that CEC remove the “is_privately_funded” field from the list of reporting requirements.

Site host fields:

- **Charging_site_host_**

ChargePoint does not necessarily know which entity is the electric utility customer of record for electric service to any given charger. As stated above, ChargePoint maintains a business relationship with the charging station operator, which can be different from the site host. Furthermore, the site host is not ultimately responsible for operation and maintenance of chargers, unless that entity is also the charging station operator.

ChargePoint recommends that CEC remove all fields beginning with “charging_station_host_” from the list of reporting requirements.

Charger site address confidential field:

- **Is_charger_site_address_confidential**

ChargePoint recommends CEC clarify that a “TRUE” value reported here would designate all of the following data fields as confidential:

- charger_site_street_address_1
- charger_site_street_address_2
- charger_site_city
- charger_site_state
- charger_site_zip_code

§3124

Documentation for exclusions

ChargePoint reiterates its concern to have documentation for outage exclusions including vandalism, theft, natural disasters and grid power loss. Reporting agents will not be the best and closest source of information regarding exclusions. Requiring reporting agents to construct systems to collect and retain exclusion documentation from charging station operators or funding recipients is a burden that is not necessary. CEC could simplify the regulations and more closely align requirements with the appropriate responsible parties (charging station operators or funding recipients) by allowing reporting agents to report on the exclusions, but requiring the charging station operators or funding recipients to retain any documentation of vandalism, theft, natural disasters or grid power loss, which CEC can request if needed.

§3125

Frequency of OCPP data transfer

ChargePoint reiterates its concern about the 60-minute OCPP data delivery cadence described in §3125 (b). This is a very large amount of data delivering it within 60 minutes would place a large burden on the charging networks. Although ChargePoint’s prior recommendation of a monthly cadence was not adopted, changing the cadence from 60-minutes to 24-hours would still help network providers reduce costs and operational overhead, and improve data quality. Allowing 24-hours to reporting will allow data from

charging managing software to be transferred to standardized data warehouses that are able to more easily handle and transfer this data to the CEC.

§3129

Entity linked to reliability metrics

The Reliability Standards Regulation section of the Staff Report clearly and correctly notes that “[f]or these regulations the recipient of public or ratepayer funding is the entity responsible for maintaining the DCFC port.” This is logical and correct, additionally, this statement holds true not just for the uptime requirements that are specific to DC chargers, but all sections of this regulation.

Although CEC has made the correct determination that the funding recipient is responsible for maintaining the ports, §3129 suggests that CEC may publicly link the charging network provider with reliability metrics that are the responsibility of the funding recipients. This is inappropriate and misleading. Knowingly linking a charging network, just one part of the charging ecosystem, to requirements placed on another entity, could deceptively represent that the charging network is responsible for reliability metrics. To address this error, the CEC should modify §3129 (a) and §3129 (c) as suggested below:

§3129(a):

Beginning 180 days after the effective date of this paragraph, CEC staff shall make reliability metrics available to funding entities so that they may be considered prior to approving any application for funding to install a publicly or ratepayer funded charger using funds from a California state agency or through a charge on Ratepayers. Such reliability metrics shall be presented as individual or aggregated charging ports by funding recipient or charging station operator.

§3129(c):

The Executive Director may assess and publicly report, including on the CEC’s website, the reliability metrics of individual and aggregated charging stations and charging ports associated with one or more funding recipient or, charging station operator, ~~or charging network provider.~~”

Sincerely,



Justin Wilson
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ChargePoint, Inc.