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MCS Exemption - Letter of Support

Additional submitted attachment is included below.

September 21, 2026

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

Submitted electronically via Docket 22-EVI-04

RE: Notice of Proposed Action, Electric Vehicle Charger Reliability Standards

Thank you for the opportunity to submit comments on the Commission's notice of proposed action regarding the rulemaking to amend the electric vehicle charger reliability standards.

Tesla strongly supports the proposed amendments to exempt chargers using the Megawatt Charging System (MCS) from reliability reporting requirements. In our view, this revision is a meaningful and impactful policy action to champion electrification of the heavy-duty trucking sector. The Commission's passage of this amendment will ensure MCS charging will be available for the thousands of MCS-based electric trucks entering service on California's roadways.

Background: Tesla Semi and the Megacharger Network

This year, Tesla launched at-scale manufacturing of the Tesla Semi, a Class 8 heavy duty electric truck, at a newly constructed factory in Sparks, Nevada. The goal of the Tesla Semi is to reduce NOx and greenhouse gas (GHG) emissions from goods movement and transportation. The Semi comes in two models with ranges of 300 and 500 miles and demonstrates that an all-electric truck can meet virtually any duty cycle when paired with megawatt-scale charging.

In July 2026, Tesla opened our first public Megacharger site operating with the MCS standard in Bloomington, CA. This charging station will be the first of many locations designed to serve heavy-duty electric Semi trucks. In the next year, Tesla plans to rapidly expand the public Megacharger network, opening dozens of locations across multiple states. In addition, Tesla's business is expanding to sell MCS-based hardware to independent operators who can own and operate their own Megachargers, serving both public and private-depot use cases, to ensure charger availability scales to meet truck demand.

The proposed exemption will support public MCS buildout in California at a critical moment.

Heavy-duty electrification is at an inflection point. Fleet operators, ports, independent site hosts, and network operators, including Tesla, are making multi-year capital decisions to build megawatt-scale charging to support a complete transformation of California's trucking industry. The Commission has sent a clear signal to the market to accelerate these investments through programs such as EnergIZE's MCS funding lane.

The importance and value of the State's heavy-duty funding programs cannot be understated. Tesla customers, for both the truck and MCS chargers, are relying on these programs to launch a fuel transition in a high-mileage, historically high-polluting sector. State programs will translate into deployed megawatt charging ports only if projects can access state funds without running into reporting obligations that are premature for MCS hardware.

The proposed exemption is consistent with the flexibility provided by statute.

Public Resources Code section 25231.5(b)(3) expressly authorizes the Commission to vary uptime recordkeeping and reporting standards by technology type. MCS is not merely a higher-power variant of existing connector types. It is a distinct technology and communications protocol recognized by SAE as J3271.

The heavy-duty MCS charging network is essentially in its infancy, in a very different development phase than the light-duty public DCFC market that the existing reliability reporting standards were intended to oversee. Applying the full suite of light-duty reliability reporting protocols, hourly data dictionaries, and OCPP 2.0.1 enrollment pathways to first-generation MCS ports would force an emerging technology into a compliance framework designed for the established light-duty DCFC network. The proposed exemption is a measured use of the flexibility the Legislature provided.

The proposed exemption should be reflected immediately within the Commission's grant program requirements for applicable chargers.

We encourage Commission staff to review existing grant agreements to ensure this exemption is adopted in practice – within grant agreements – not only within the regulation. Because grant administrators may elect to establish requirements that go beyond the minimum, care should be taken to ensure the Commission's policy direction, as proposed in this rule, are reflected in the Commission's implementation of its own MCS grant requirements.

Conclusion

Tesla applauds the Commission's action to revise reliability reporting requirements that would otherwise pose a significant compliance hurdle for public MCS charging projects. The proposed rulemaking is a practical step that will help heavy-duty chargers get built, support fleet electrification, and ensure the Commission's funding programs are successful.

We respectfully urge prompt action by the Commission to approve this rule.

Sincerely,

Mal Skowron
Staff Policy Analyst, Charging
Tesla, Inc.