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Comment Received From: Julio Guzman
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Public Charging Reliability Modernization and Expansion

Please see my attached public comment and multi-site photographic evidence documenting EV charging outages, damaged or unavailable charging hardware, reduced usable capacity, LADWP repair correspondence, and recommendations concerning reliability, modernization, maintenance, redundancy, and expansion of public charging infrastructure.

Additional submitted attachment is included below.

PUBLIC COMMENT - CEC DOCKET 22-EVI-04

Electric Vehicle Charging Infrastructure Reliability
Multi-Site Los Angeles Field Evidence

Submitted by	Julio Guzman
Role	Member of the Public / California EV Driver
Date	September 22, 2026
Title	Public Charging Reliability, Modernization, and Expansion - Multi-Site Los Angeles Field Evidence

Comment

I submit this comment as a California EV driver who relies on public charging. The attached photographs are a multi-site field sample from LADWP public charging equipment I personally encountered in Los Angeles during August and September 2026. They show different forms of unavailability, physical deterioration or damage, error conditions, and reduced usable charging capacity. I do not claim this sample establishes the failure rate of LADWP's entire network; I submit it because it shows the real-world conditions a driver can encounter across multiple public charging sites in a short period.

The strongest longitudinal example is LADWP Station 4986. On August 25, 2026, I photographed its display stating: **"All outputs are out of order and are not able to charge at the moment."** On September 10, 2026, I returned to the same identified station and photographed the display stating: **"Out of order. This charger is out of order. The problem has been reported."** These are two documented observations 16 days apart; I do not claim they prove continuous downtime during every minute between those observations.

I also previously reported failures at LADWP Stations 2607 and 4986. LADWP created Work Orders 2017226 and 2005982 and informed me in writing that there was **"no ETA"** for repair and that its EV Charger Repair team was experiencing a **"high volume of alerts."** My additional photographs document Station 2607 with damaged/open charging hardware; Station 3741 with damaged charging hardware, a visibly damaged interface, and a communication-error screen; Station 3678 marked out of order; Station 4987 with a stopped session showing 0.000 kWh and 0 kW and reduced connector availability; and Station 3676 with CHAdeMO operating while the CCS position appeared unavailable, reducing usable capacity. Additional electrical equipment was also photographed locked/tagged with a handwritten notice that the EV charger was broken and should not be used.

These conditions show why charger counts alone do not describe useful public charging capacity. A charger may remain physically installed or appear on a map while one or more ports cannot deliver a successful charging session. Reliability should therefore be measured at the port level and should include outage duration, restoration time, repeat failures, failed sessions, and actual usable capacity.

Reliability, Modernization, and Continuity of Service

Existing public charging capacity should remain available wherever feasible while unreliable, deteriorated, or obsolete equipment is repaired, replaced, or upgraded. Modernization should be sequenced so that drivers are not unnecessarily left with fewer usable charging options during repair and replacement.

Reliability also requires redundancy. A location dependent on one functioning fast-charging port can lose most or all of its usefulness when that equipment fails. High-demand public locations should be evaluated for multiple independently usable ports so that one equipment failure does not eliminate charging access.

Maintenance is infrastructure. Programs should account for remote fault monitoring, adequate inventories of replacement parts, qualified repair personnel, preventive maintenance, cleaning, physical protection, lighting, accessibility, and measurable restoration performance over the equipment's useful life.

Expansion and Resilient Public Charging

Repair and expansion should occur together. California needs functioning existing chargers while adding capacity where drivers actually need it. Suitable publicly controlled parking facilities - including parks, libraries, beaches, recreation centers, transit facilities, civic properties, and other high-demand destinations - should be evaluated for Level 2 and DC fast charging based on actual use and local demand.

Where technically and economically appropriate, new and modernized sites should evaluate **solar parking canopies, grid-connected charging, battery energy storage, and multiple charging ports**. Solar is not a substitute for adequate electrical service. Used with the grid and storage, however, it can be one component of more resilient distributed charging infrastructure while making productive use of existing parking areas.

Residents who rent, live in multifamily housing, or otherwise lack dependable home charging should not be left dependent on a small number of unreliable public ports. Public charging should be designed around the people who actually depend on it.

Requested Reliability Metrics and Accountability

1. Functioning ports, not merely chargers installed.
2. Outage duration and time from fault detection or customer report to restoration.
3. Repeat failures and recurring equipment problems.
4. Successful charging sessions and failed-session rates.
5. Utilization, congestion, and wait-time indicators where feasible.
6. Geographic differences in reliability and access.
7. Maintenance responsiveness and adequacy of repair capacity.

Relationship to California's 97 Percent Uptime Standard

CEC guidance states that applicable publicly funded DC fast chargers installed on or after January 1, 2024 must meet a 97 percent uptime standard, subject to specified exclusions. Uptime is calculated per port and requires the charger hardware and software to be online, the port to be available for use, and the charger to successfully dispense electricity. I do **not** assert that the LADWP stations documented here necessarily fall within that specific performance requirement because I do not have verified installation dates and funding histories for each unit.

That limitation should not make older or otherwise non-covered public infrastructure invisible. Drivers experience an unavailable charger the same way regardless of installation year or original funding source. I ask the Commission, within its authority, to examine reliability across the broader public charging network and to use reliability information to inform future funding, modernization, maintenance expectations, and program design.

Requested Consideration

I respectfully ask the Commission to consider this multi-site field evidence as it implements and refines California's charger reliability framework. California needs enough public charging capacity, functioning equipment, redundancy when equipment fails, rapid repair, modernization of aging or deteriorated infrastructure, and expansion where people actually need service. **A charger that exists but cannot charge a vehicle is not useful charging infrastructure.**

Respectfully submitted,

Julio Guzman

Member of the Public / California EV Driver

EVIDENCE SUMMARY

Observed conditions are described conservatively; photographs establish condition, not cause.

Station / evidence	Observed condition
4986	Out-of-order displays photographed Aug. 25 and Sept. 10, 2026; two observations 16 days apart.
2607	Station ID visible; charging hardware photographed physically open/damaged with internal components visible.
3741	Station ID visible; damaged CCS hardware/interface; separate screen shows communication error.
3678	Station ID visible; equipment marked out of order / broken.
4987	Display shows charging stopped at 0.000 kWh and 0 kW; CCS position appears unavailable/empty.
3676	CHAdEMO session shown operating; CCS position appears unavailable/empty, indicating reduced usable capacity.
Additional equipment	Padlocked electrical equipment tagged with a handwritten notice indicating the EV charger was broken and should not be used. The station ID is not visible in this photograph.

PHOTOGRAPHIC EXHIBITS

Photographs supplied by the submitter. Captions distinguish total outage from reduced capacity where the evidence supports that distinction.

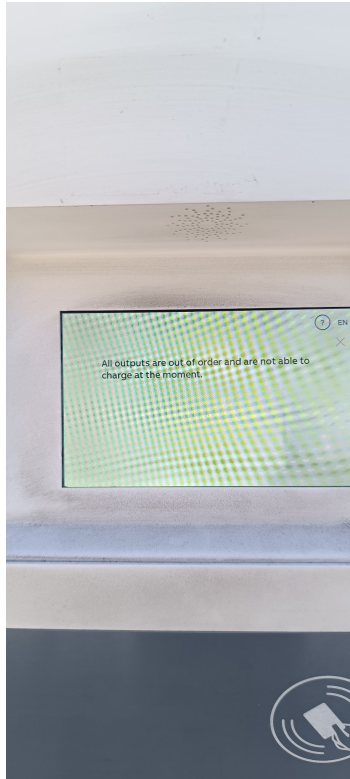


Exhibit A - Station 4986, August 25, 2026. Display states that all outputs are out of order.



Exhibit B - Station 4986, September 10, 2026. Display states the charger is out of order.



Exhibit C - Station 4986. LADWP label confirms Station ID 4986.



Exhibit D - Station 2607. LADWP Station ID is visible.



Exhibit E - Station 2607. Close view of physically open/damaged charging hardware with internal components visible.



Exhibit F - Station 3741. LADWP Station ID is visible.



Exhibit G - Station 3741. Damaged charging hardware and visibly damaged interface/display.

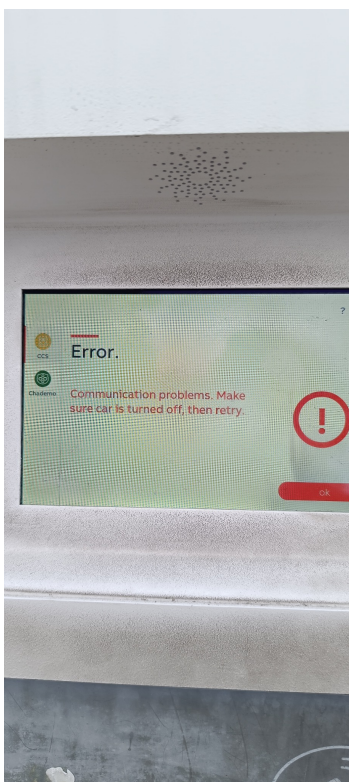


Exhibit H - Charging equipment display showing a communication error. Submitted with the Station 3741 field observations.

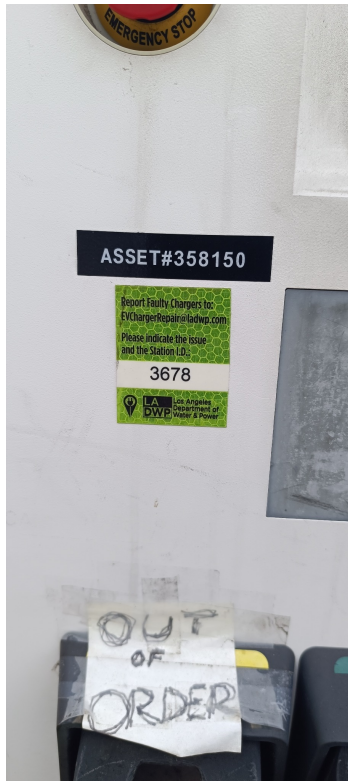


Exhibit I - Station 3678. LADWP Station ID visible; equipment marked out of order/broken.

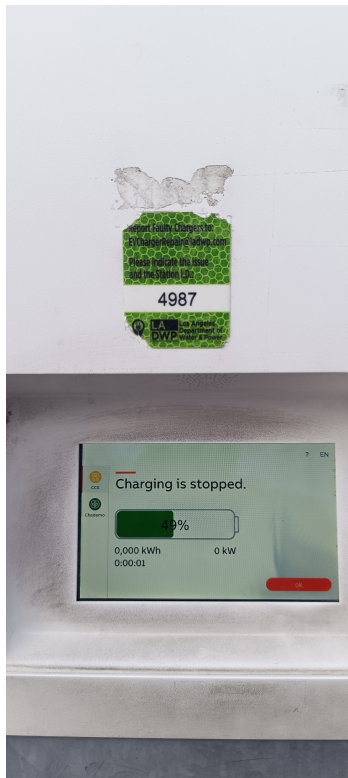


Exhibit J - Station 4987. Display shows charging stopped, 0.000 kWh and 0 kW.



Exhibit K - Station 4987. Wider view; CCS position appears unavailable/empty while CHAdeMO hardware remains.

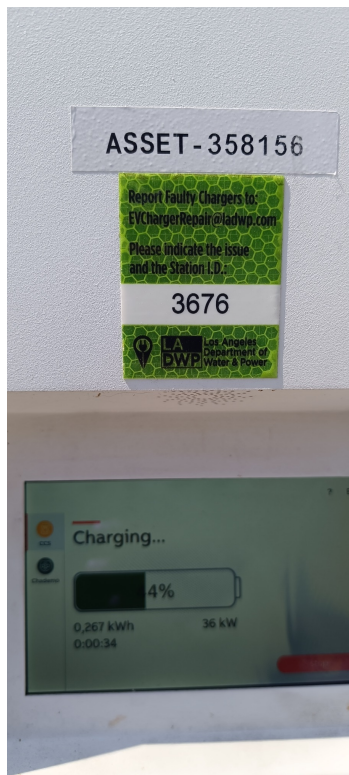


Exhibit L - Station 3676. Station ID visible; CCS position appears unavailable/empty.



Exhibit M - Station 3676. Separate observation shows a CHAdeMO session delivering power, demonstrating reduced capacity rather than total station failure.



Exhibit N - Additional electrical equipment padlocked/tagged with handwritten notice indicating the EV charger is broken and should not be used. Station ID is not established by this image.

CORROBORATING LADWP CORRESPONDENCE

Station 4986 - Work Order 2005982



Re: [EXTERNAL] Public EV Chargers Out of Service + Posted LADWP Repair Email Is Invalid



EV Charger Repair Shared Ma... 8:11 AM ☆
To [Julio Guzman & 1 more](#)
Aug 31 at 8:11 AM

Hello Julio,

Work Order 2005982 was created for EVID 4986, and a crew is trying to assess the issues with this EV Charger. There is no Eta on when these chargers will be fixed.

Our EV Charger Repair team is currently experiencing a high volume of alerts, and will attempt to resolve this issue as quickly as possible.

— .

Exhibit O - LADWP EV Charger Repair correspondence dated August 31, 2026. LADWP states that Work Order 2005982 was created for EVID 4986, that a crew was trying to assess the issues, that there was "no Eta" for when the chargers would be fixed, and that the EV Charger Repair team was experiencing a "high volume of alerts." The image has been cropped to avoid unnecessarily publishing the submitter's personal email address.

REGULATORY AND TECHNICAL CONTEXT

Official California Energy Commission sources checked September 22, 2026

Current proceeding. Docket 22-EVI-04 is the CEC proceeding for Electric Vehicle Charging Infrastructure Reliability Reporting and Performance Standards. The Commission has a public hearing scheduled for September 24, 2026 on proposed amendments to the charger reliability standards.

97 percent uptime standard. CEC guidance states that covered DC fast charging ports installed January 1, 2024 or later and receiving qualifying public or ratepayer funding must meet a 97 percent uptime standard for six years, subject to specified exclusions. Uptime is calculated **per port**, and the port must be online, available for use, and successfully dispense electricity.

Broader inventory reporting. Separate CEC inventory-reporting requirements cover EV chargers outside specified residential and other exceptions and require information including installation date, serial number, network status, port count, connector type, site host, charging-station operator, and funding recipient. The first semiannual inventory report is due January 31, 2027 for the July-December 2026 reporting period.

Funding decisions and equity. The adopted regulatory text provides that, beginning September 28, 2026, CEC staff will make reliability metrics available to funding entities so the metrics may be considered before approving qualifying charger funding. It also permits public assessment of reliability metrics, including variations across income levels.

Scope of this submission. This filing does not claim that the photographed LADWP stations are covered by the 97 percent performance standard because their installation dates and qualifying funding histories have not been verified. The photographs and LADWP correspondence are submitted as field evidence relevant to the broader reliability, maintenance, modernization, redundancy, and public-access issues before the Commission.

Official sources:

California Energy Commission - Electric Vehicle Charging Infrastructure Reliability Reporting and Performance Standards
<https://www.energy.ca.gov/proceeding/electric-vehicle-charging-infrastructure-reliability-reporting-and-performance>

California Energy Commission - EV Charger Performance Standards and Uptime Reporting Regulations
<https://www.energy.ca.gov/programs-and-topics/programs/clean-transportation-program/ev-charger-data-and-reliability-1>

California Energy Commission - EV Charger Inventory Reporting Regulations
<https://www.energy.ca.gov/programs-and-topics/programs/clean-transportation-program/ev-charger-data-and-reliability-0>

California Energy Commission - EV Charger Data and Reliability Standards Full Regulatory Text
<https://www.energy.ca.gov/media/12609>