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Comments on EV Charger Reliability Amendments and Implementation Clarity

Thank you for the opportunity to comment on the proposed amendments to California's electric vehicle charger reliability standards.

My name is Roshan Saxena. I am a student in Santa Clara County, help lead the FUHSD Climate Collective, and serve as a youth member of the Santa Clara County Sustainability Commission. I am submitting these comments in my personal capacity.

I appreciate the Commission's attention to the practical challenges of deploying new charging technology. Supporting heavy-duty electrification while maintaining public confidence in charging infrastructure is important, and I appreciate staff's work to make the requirements clearer and more workable.

Regarding the proposed exemptions for Megawatt Charging System equipment, I encourage the Commission to explain how it intends to evaluate whether those exemptions remain appropriate as deployment grows. A future public review, informed by operating experience and technology maturity, could help preserve flexibility today while providing a clear path toward appropriate reliability expectations over time.

It would also be helpful to provide a short implementation guide explaining which inventory, reporting, and reliability obligations continue to apply. In particular, examples covering installations with both Megawatt Charging System and other connector types could help operators understand the boundaries of the exemptions and avoid inconsistent interpretations.

Thank you for considering these suggestions and for the detailed work involved in supporting dependable clean transportation.