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Electrify America - Comments on Proposed Amends to EV Charger Reliability Rulemaking

See attached letter for comments. Thank you.

Additional submitted attachment is included below.



September 22, 2026

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

RE: Electrify America comments on the Rulemaking to Amend Regulations for Improved EV Charger Recordkeeping and Reporting, Reliability, and Data Sharing (Docket No. 22-EVI-04)

Dear Commissioner Skinner and Staff:

Electrify America appreciates the opportunity to comment on the California Energy Commission's (CEC) proposed amendments to the EV Charger Data and Reliability Standards, Title 20, California Code of Regulations, Division 2, Chapter 12, Article 2, as noticed on August 7, 2026.

About Electrify America

Electrify America is one of the nation's largest open Hyper-Fast networks of DC fast chargers (DCFC) for electric vehicles (EVs), with over 1,400 chargers across more than 285 locations open to the public in California. As part of our drive to build the charging network of the future, Electrify America continues to implement strategies that include deploying next generation technology at existing and new stations, increasing the number of chargers at existing stations, and building bigger stations to better accommodate growing demand. Additionally, we are investing in battery energy storage solutions (BESS) in combination with our large format charging sites and other new technologies that ultimately enhance the driver experience. Electrify America remains focused on the reliability of its charging network in order to provide a seamless customer experience.

OCPP Certification Implementation Changes

Electrify America strongly commends the Commission's decision to offer more flexible timelines for achieving OCPP 2.0.1 certification. The introduction of a "Certification Pending" track under Section 3131(a)(6)(B) is a highly pragmatic solution. It enables network operators to enroll and function as active recordkeeping and reporting agents while simultaneously finalizing their OCPP 2.0.1 Subset Certification. Attaining this certification demands substantial technical and engineering resources.

Unfortunately, the initial timeline failed to reflect current bottlenecks at testing facilities and the sheer complexity of the integration. By measuring progress instead of enforcing strict compliance



from day one, the CEC successfully prevents qualified networks from being locked out of the program during this vital deployment phase.

Furthermore, Electrify America fully endorses the updates to Section 3122(c). Assigning the role of recordkeeping and reporting agent directly to the provider delivering network services for publicly or ratepayer-funded stations is a logical step. Eliminating the older rule—which required site hosts or funding recipients to manually appoint a network provider—significantly cuts down on administrative friction. This adjustment reflects how the industry actually operates, as network providers naturally possess the infrastructure needed to seamlessly gather and submit compliance data.

We would also note the need for greater clarification regarding the proposed "Certification Pending" track outlined in Section 3131(a)(6)(B)(ii) for charging networks seeking enrollment before finalizing their OCPP 2.0.1 Subset Certification. As written, Section 3131(a)(6)(B)(ii) seems designed as a separate alternative to the "Certification Obtained" standard in Section 3131(a)(6)(B)(i). This mechanism should logically allow a network provider to qualify for enrollment while still working toward compliance, provided specific criteria are met. However, the language in subsection (c) of this alternative pathway mandates that operators secure their Subset Certification "by 180 days after the effective date of this regulation," and is, therefore, in conflict with the rest of the language.

Because the language in subsection (c) mirrors the exact same deadline found in the primary threshold condition, the "Certification Pending" option fails to offer a distinct or flexible timeline. As currently drafted, it provides no practical procedural difference from the standard route. Electrify America respectfully asks the CEC to clarify how these two pathways are intended to differ, and specifically whether subsection (c) language should be adjusted to offer an extended compliance window or additional regulatory flexibility.

Charger Inventory Reporting

Electrify America urges the CEC to align the charger inventory reporting mandates under Article 2 with the data collection frameworks required by ZEV Infrastructure Reporting (ZEVIR) for CEC funded projects. Currently, Section 3123 dictates semiannual inventory reporting via the Semiannual Charger Data Reporting Specification. Concurrently, ZEVIR mandates a separate Utilization Inventory template for grant-funded infrastructure. While both frameworks request nearly identical data regarding charger identity, location, hardware, network configuration, and power capabilities, they enforce entirely different schemas and workflows. Forcing network operators to manage duplicate mapping systems for the same physical assets introduces unnecessary administrative friction and elevates the risk of data entry discrepancies and formatting mismatches.

To resolve this, Electrify America recommends establishing a unified core inventory schema and standardized nomenclature shared by both EV-CARR and ZEVIR. Alternatively, the CEC could permit an Article 2 inventory filing to automatically satisfy identical fields within the ZEVIR system. Any program-



specific metrics could simply be appended as supplementary fields. This change mirrors the streamlining principles the CEC has successfully utilized in its Data Sharing Agreement process, minimizing duplicative workloads while boosting data precision and reliability for both the state and charging networks.

Conclusion

In conclusion, Electrify America appreciates the California Energy Commission's dedicated work and collaborative approach in updating these regulations to better reflect modern industry realities. To maximize the success of these updates, we welcome the opportunity to work together to refine the "Certification Pending" language, ensuring the final framework provides the practical flexibility intended. Furthermore, we look forward to collaborating on unifying the EV-CARR and ZEVIR reporting schemas to streamline workflows, eliminate data redundancies, and successfully advance our shared clean transportation goals.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Michael Daft', with a stylized flourish at the end.

Michael Daft

Gov't Affairs & Public Policy Lead – State Government
Electrify America, LLC