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EV Realty Comments - Charging Standards, Exemptions, and Timelines

Additional submitted attachment is included below.

September 22, 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 California Energy Commission (CEC) notice of proposed action regarding the rulemaking to amend the electric vehicle charger reliability standards.

EV Realty develops, owns, and operates multi-fleet EV charging hubs for commercial fleets using both Megawatt Charging System (MCS) and Combined Charging System (CCS) charging solutions. We generally agree with the problem statements in the Initial Statement of Reasons (ISOR) and appreciate the stated intent to provide additional flexibility in the regulations given the nascent state of the market and the technology. While our sites operate as “fleet chargers” as defined in the regulation, meaning that some of the changes currently under consideration are not applicable, we have a vested interest in fostering the growth of a robust and competitive heavy-duty EV market. We therefore offer the following recommendations intended to further support the market and ensure consistency across the CEC rules and programs.

Align funding program requirements and exemptions with the regulations. The ISOR rightly states that existing charger reliability standards “do not account for implementation differences between charging for passenger cars and heavy-duty trucks” and that reducing regulatory burden for this nascent sector “is expected to encourage and foster its growth.”¹ We agree. CEC has already provided exemptions to various portions of the regulation for multiple charger types (fleet chargers, research chargers, off-grid chargers, etc.) and is proposing here to extend certain exemptions to MCS. For clarity and consistency across agency programs, we encourage CEC to ensure that exemptions incorporated into the regulations flow down to relevant CEC funding programs such as EnergiIZE.

Extend heavy-duty charger flexibilities beyond MCS. The heavy-duty electric truck market remains nascent with first generation trucks and limited infrastructure deployment. We applaud CEC for recognizing the need for some flexibility. However, any new heavy-duty charging flexibilities in this regulation should extend beyond standalone MCS. Many manufacturers have recently introduced dual MCS/CCS chargers that have the flexibility to charge trucks meeting both standards.² For infrastructure developers looking to serve a diverse customer base, this is an obvious solution to the lack of standardization across the industry today. We recommend confirming that this hardware configuration would be exempt from the requirements as there is uncertainty across the industry on this point.

¹ ISOR, page 1 and page 5.

² For example, Alpitronic, ABB, Kempower, and Power Electronics have all either announced or released charging hardware solutions that can serve both MCS and CCS trucks. With CCS trucks on the road today, including medium duty vehicles that are not expected to transition to MCS, we expect continued demand for these solutions.

Applying regulations to CCS ports but not MCS ports even when they are connected and share underlying power electronics simplifies operation for standalone MCS while adding cost and complexity for infrastructure developers that choose charging solutions intended to serve a broader market.

Eliminate the requirement for an enrolled charging network provider where it is not needed.

§3122(c)(2) requires an **enrolled** charging network provider to serve as the recordkeeping and reporting agent. The proposed amendments reinforce this requirement, stating again that the charging network provider should be an **enrolled** network provider. The enrollment process and requirements in §3131(a)(6) are built around providing data in through API to the CEC as required in §3125(b).³ These technical requirements are unnecessary for chargers that are exempt from providing the data in §3125(b). We therefore recommend a conforming amendment to §3122(c)(2) clarifying that an enrolled charging network provider is only required for chargers subject to the reporting requirements of §3125(b). For chargers not subject to these data requirements, the enrollment process and requirements are unnecessary, and any charging network provider (enrolled or not) should suffice.

Harmonize exemptions across regulatory requirements. The MCS exemptions at times go further than other exemptions already provided in the regulations for things like fleet and research chargers. For example, the proposed language would exempt MCS chargers from the customer service requirements in §3127. As noted in the ISOR, “Since CEC staff propose to exempt MCS chargers from reliability requirements, this requirement is no longer necessary.”⁴ This logic should extend to other charging use cases that are similarly exempt from reliability requirements but not currently exempt from §3127. This simple amendment would ensure consistent treatment and rationale across CEC regulations.

EV Realty would like to thank the California Energy Commission (CEC) staff for the work to date on the EV Charger Reliability Standards. We support the additional time for OCPP 2.0.1 certification. We also support the intent of heavy-duty charging exemptions and the desire to provide additional flexibility as this industry matures. The minor modifications proposed above are intended to improve consistency across CEC programs and to foster the growth of a strong and competitive market for charging to meet fleet needs.

We look forward to continuing collaboration with CEC on commercial fleet electrification. For additional information, please contact me at jamie@evrealtyus.com.

Sincerely,

Jamie Hall
Sr. Director, External Affairs
EV Realty

³ §3131(a)(6) has the following technical requirements: (A) The Hourly Charger Data Reporting Specification as incorporated by reference in section 3125(b) to permit the charging network provider to transfer the data required to be submitted pursuant to Section 3125(b), and (B) Subset Certification of the Charging Station Management System in the Open Charge Alliance OCPP Certification Program for OCPP version 2.0.1, published May 06, 2024, for Core and Advanced Security.

⁴ ISOR, page 6.