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**Ford Motor Company Comments on Proposed Amendments to EV
Charger Reliability Standards**

Additional submitted attachment is included below.



Ford Motor Company

World Headquarters

One American Road
Sustainability, Homologation and Compliance
Dearborn, MI 48126

September 22, 2026

Docket No. 22-EVI-04

California Energy Commission
715 P Street
Sacramento, CA 95814

Re: Ford Motor Company Comments on Proposed Rulemaking to Amend Electric Vehicle Charger
Reliability Standards, Docket No. 22-EVI-04
(Express Terms and Initial Statement of Reasons Published August 7, 2026)

Ford Motor Company (Ford) thanks the staff and leadership of the California Energy Commission (CEC or Commission) for the opportunity to comment on the proposed amendments to Title 20, California Code of Regulations, Division 2, Chapter 12, Article 2 (Sections 3121, 3122, 3123, 3125, 3127, 3128, 3131, and 3132). Ford supports many of the Commission's stated goals in this rulemaking and remains committed to supporting reliable, well-reported EV charging infrastructure in California, including through the BlueOval™ Charge Network and Ford's dealer charging network, Ford Charge.

Ford writes to raise one significant concern: the proposed changes to Sections 3122(c) and 3131(a), which when read together, would require mandatory enrollment for chargers installed as far back as January 1, 2024, and not just newer chargers. Below, Ford explains why and proposes a targeted fix.

I. Sections 3122(c) and 3131(a) Would Combine to Require Mandatory Enrollment for Chargers Installed as Early as January 1, 2024

A. How the two changes combine

Today, Section 3131(a) says a charging network provider ("CNP") "may apply" to become an enrolled CNP. Enrollment is voluntary. The proposed text changes this to "must apply" for any CNP serving as a recordkeeping and reporting agent under Section 3122(c)(1) or Section 3122(c)(2). These two subsections cover two different groups of chargers:

- Section 3122(c)(1): chargers installed January 1, 2024 through September 27, 2026.
- Section 3122(c)(2): chargers installed on or after September 28, 2026.

Separately, the proposed amendments to Section 3122(c)(1) and (c)(2) remove the current requirement that a site host or funding recipient affirmatively designate a CNP as the recordkeeping and reporting agent. Instead, the CNP providing networking service for a charger automatically becomes the recordkeeping and reporting agent. The initial statement of reasons (“ISOR”) explains that this change is meant to remove ambiguity; it “clearly identifies that the charging network provider shall serve as the recordkeeping and reporting agent without any formal or informal designation process.”

Put together, these two changes mean that any CNP servicing a networked, publicly or ratepayer funded charger, whether installed in January 2024 or September 2026, automatically becomes the recordkeeping and reporting agent and is therefore now required to apply for enrolled CNP status under Section 3131(a).

That requirement is not a light one. Under Section 3131(a)(6)(B), a CNP must either already hold OCPP 2.0.1 Subset Certification for its charging station management system or qualify for a temporary “Certification Pending” status. On top of that, Section 3131(c) requires the CNP to pass a live API data-transfer demonstration, which depends on the charger and central system running OCPP 2.0.1.

Ford’s networked, publicly or ratepayer funded chargers at Ford dealer locations, including chargers installed on or after January 1, 2024, run on a platform that does not currently support OCPP 2.0.1. If Section 3131(a) requires Ford to apply for enrolled CNP status for that earlier group of chargers, Ford would have to attempt a certification and live demonstration that it cannot currently pass, not because Ford is failing to meet its actual reporting duties, but because the enrollment process itself assumes a technical capability that this earlier group of chargers was not required to have.

That last point matters because Section 3125(c) already gives recordkeeping and reporting agents for this same 2024–2026 group of chargers a way to comply without OCPP 2.0.1 at all: retaining fifteen-minute interval data on each charging port for six years. Making enrollment mandatory under Section 3131(a) would effectively force OCPP 2.0.1 certification on this group, regardless of which reporting method they use.

Ford also does not see a clear path around this through the “Certification Pending” pathway. That pathway requires a CNP to meet the requirements of Section 3125(a), but Section 3125(a) only applies to chargers installed on or after September 28, 2026, by its own terms. A CNP whose recordkeeping and reporting duties come solely from Section 3122(c)(1) chargers does not appear to have a way to qualify for Certification Pending status. Ford would appreciate the Commission confirming whether this reading is correct.

B. This appears to go beyond what the ISOR describes as the reason for the change

The ISOR is clear that it intends CNPs to become enrolled CNPs if they are recordkeeping and reporting agents under either Section 3122(c)(1) or (c)(2), but the ISOR’s own explanation for that link cites Section 3125(a), which, again, only applies to chargers installed on or after September 28, 2026. That does not match the actual reach of Section 3131(a), which pulls in the 2024–2026 group as well.

Ford also looked for a cost analysis specific to this 2024–2026 group in the ISOR’s Economic Impact Statement and did not find one; the ISOR states only that the private-sector cost impact of the rulemaking is \$0 and that it will affect zero businesses. Taken together, this suggests the cost of requiring

OCPP 2.0.1 certification for this earlier group of chargers may not have been fully considered. To meet this requirement, charging station management system software would need to be updated to support OCPP 2.0.1, and subset certification of the charging station management system would need to be obtained for the applicable modules. These requirements bring development, testing, and certification costs. Chargers installed prior to September 28, 2026, would not actually be required to use OCPP 2.0.1 meaning the cloud software capabilities would be developed for purposes of registration only.

C. Recommended fix

Ford recommends that the Commission revise Section 3131(a) so the mandatory “must apply” requirement applies only to CNPs serving as recordkeeping and reporting agents under Section 3122(c)(2) (chargers installed on or after September 28, 2026). Enrollment for CNPs whose only duties arise under Section 3122(c)(1) would go back to being voluntary (“may apply”), preserving the Section 3125(c) alternative for that earlier group.

If the Commission would prefer to keep enrollment mandatory for both groups, Ford recommends that the Commission clarify that a recordkeeping and reporting agent using the Section 3125(c) retained-data alternative may instead satisfy Section 3131(a) through a registration-only path: providing the identifying and contact information required by Section 3131(a)(1) through (5), without the OCPP 2.0.1 Subset Certification, Certification Pending, or Section 3131(c) live API demonstration requirements. This would give the Commission the CNP contact information it needs for oversight without imposing new OCPP 2.0.1 obligations on chargers installed before September 28, 2026. Ford also recommends clarifying Section 3131(a)(6)(B)(ii)(a)’s reference to Section 3125(a) so it works for CNPs whose duties arise solely under Section 3122(c)(1).

II. Ford Supports the Proposed Disclosure Requirement in Section 3132(a)(2)

Ford supports the proposed Section 3132(a)(2), which requires a funding recipient to disclose reporting obligations to its CNP when the two are separate entities. The ISOR explains this is needed because a CNP “may not be aware that a charger that they manage is subject to the scope of this Article by virtue of the charger’s funding source.” This is a sensible, low-burden fix, and Ford encourages the Commission to adopt it as proposed.

III. Other Observations

Ford also supports the proposed revocation process for enrolled CNP status under Sections 3131(e) through (j), including a Notice of Intent to Revoke, an opportunity to cure, and appeal rights. These protections do not exist today and add helpful clarity and fairness for CNPs, including Ford.

Ford appreciates the Commission's continued engagement with industry on these important issues and looks forward to working collaboratively with CEC staff to resolve the concerns raised above before this rulemaking is finalized. Please feel free to contact Brandon Praet, Charging and Energy Services Policy SME, at bpriet1@ford.com, if Ford can provide any additional information or support.

Sincerely,

Mark Polster

Vehicle Environmental Regulatory Strategy Manager