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**Meridius LLC Comments on Proposed MCS Exemption from
Charger Reliability Standards**

Additional submitted attachment is included below.

MERIDIUS LLC

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California Energy Commission

Docket Unit, MS-4

Docket No. 22-EVI-04

715 P Street

Sacramento, CA 95814

Submitted electronically via Docket 22-EVI-04

RE: Notice of Proposed Action, Electric Vehicle Charger Reliability Standards: Proposed Exemption for Megawatt Charging System (MCS) Chargers

Thank you for the opportunity to comment. Meridius LLC supports heavy-duty truck electrification and the Commission's goal of getting megawatt charging built. We respectfully recommend that the Commission not exempt MCS chargers from the reliability standards. Instead, keep the requirements in place for every publicly funded charger, whatever its connector, and ease the consequences of falling short while MCS matures. That preserves the status quo, keeps performance data visible to everyone, and keeps competition between hardware and vehicle platforms on equal terms. The market is already offering 97% uptime on MCS, so the standard is achievable. Our recommendations follow.

About Meridius LLC

Meridius LLC is an independent advisory firm focused on zero-emission commercial vehicles. Its founder, Jason Roycht, has worked in fuel cell and battery-electric trucking since 2016. He is a former Vice President at Nikola, where he was involved in fleet programs including the Anheuser-Busch fuel cell truck program, and he previously spent about two decades at Robert Bosch in the United States, Europe and China, including as Global Key Account Manager for Ford. Meridius publishes independent analysis of California's heavy-duty incentive programs (HVIP, CCFR, EnergiIZE) and truck charging deployment.

1. Background: why the rule exists

The reliability standards grew out of a consumer problem. A 2022 field study of every open public CCS fast charger in nine Bay Area counties found 27.6% of 657 chargers non-functional [1]. AB 2061 (Ting, 2022) directed the Commission to set uptime recordkeeping and reporting standards for chargers funded by the state or ratepayers, and AB 126 (2023) directed it to adopt uptime and operation and maintenance requirements [2][3]. The Commission adopted the standards on October 8, 2025, effective April 1, 2026: publicly or ratepayer-funded DC fast chargers installed on or after January 1, 2024 must maintain 97% annual uptime for six years (§3128) [4]. The standards are connector-agnostic, and at the trucking industry's request privately operated fleet chargers were exempted [5].

The principle is sound and should carry over: when public money builds a charger, the public should be able to rely on it and see how it performs. Commission staff confirmed at the July 22, 2026 workshop that the standards are enforced "through our grant terms" [6].

2. What the proposal does

For charging ports equipped with an MCS connector, the August 7, 2026 Express Terms would remove the 97% uptime standard (§3128(c)), the uptime section of the semiannual report (§3123(c)(5)), hourly

reporting (§3125(h)), and the requirement to offer drivers an outage-reporting mechanism (§3127) [7]. The Initial Statement of Reasons explains that MCS is "new and untested at scale" [7]. No sunset or review date is proposed.

3. Concern: the exemption follows the plug, not the technology

Tesla's September 21 comment supports the exemption on the grounds that "MCS is not merely a higher-power variant of existing connector types," that "the heavy-duty MCS charging network is essentially in its infancy," and that "first-generation MCS ports" should not be forced into a framework "designed for the established light-duty DCFC network" [9]. That reasoning fits megawatt-class hardware. It does not fit lower-power chargers that use the MCS connector.

Tesla's Basecharger, for example, is rated at 120 kW DC output (125 kW AC input; 150 A, 180–1,000 V), is priced from \$40,000, and is intended for depot and overnight charging, with deliveries expected in early 2027 [8]. That power level is below today's market for truck charging: Tesla's own European Semi adapter is designed for 350 kW CCS2 chargers [10]. It is squarely within established DC fast-charging practice. Under the proposal, two funded chargers doing the same job at the same site would face different obligations based only on the connector:

	120 kW DC charger with CCS1 connector	120 kW DC charger with MCS connector (e.g., Tesla Basecharger)
Power / voltage	120 kW DC, up to 1,000 V	120 kW DC (125 kW AC input), 150 A, 180–1,000 V [8]
Typical use	Depot / overnight truck charging	Depot / overnight truck charging [8]
Publicly funded: 97% uptime (§3128)	Required	Exempt under proposed §3128(c)
Uptime and hourly reporting (§§3123, 3125)	Required	Exempt under proposed §3123(c)(5), §3125(h)
Driver outage-report channel (§3127)	Required	Exempt as proposed

If maturity is the concern, the answer is transitional flexibility on consequences, not a connector-based exemption from the standard itself. Tesla's own public description of its MCS chargers as "the same hardware" as its car network, with a different handle [19], suggests the maturity gap is narrower than the proposal assumes.

4. Tesla's own statements: MCS runs on proven hardware, and 97% is already offered

Three days after its letter to the Commission, Tesla described its MCS charging very differently at its Semi factory event on September 24, 2026. The Semi program lead said [19]: "The reliability is 99.7, something like that. It just works... We're using that same service and support network... it's the same hardware. I mean, the handle is different because we have a different interface. These are MCS-equipped handles." He added that "uptime is super super important" and that Tesla is "designing for full interoperability."

Tesla to the Commission, Sept 21, 2026 [9]	Tesla on stage, Sept 24, 2026 [19]
"MCS is not merely a higher-power variant of existing connector types."	"It's the same hardware. I mean, the handle is different because we have a different interface."

"The heavy-duty MCS charging network is essentially in its infancy."	"The reliability is 99.7, something like that. It just works."
Spare "first-generation MCS ports" a framework "designed for the established light-duty DCFC network."	"We're using that same service and support network."

For its high-power Megacharger, Tesla also already offers site hosts a Maintenance Package with "a 97% uptime guarantee and 10+ year equipment service agreement (parts and labor included)" [11]. The 99.7% figure refers to Tesla's charging network overall, not a measured MCS uptime. But if the leading MCS supplier describes its MCS chargers as the same hardware and service network behind that record, and sells a 97% guarantee on them, then keeping the 97% standard for MCS asks nothing more than the market already promises. Publishing the results lets fleets, hosts and the Commission see whether those promises hold.

5. Concern: interoperability and the value of existing public investment

DOE's station data lists at least 162 public DC charging ports at seven California sites designated for heavy-duty vehicles, all with CCS connectors, including two sites that also offer MCS [12]. Much of this was built with public support; Greenlane's Colton site alone received a \$15 million South Coast AQMD grant [13]. For its European Semi, Tesla has introduced an official CCS2-to-MCS adapter so the truck can use existing chargers while MCS is built out [10]. No comparable CCS option has been announced for the U.S. Semi. As a result, MCS-only trucks funded by California programs cannot use the CCS truck charging the state has already funded, while, under the proposal, MCS ports would carry lighter obligations than those CCS ports. The Commission, together with CARB, should consider interoperability in its funding decisions.

6. Recommendations

1. **Keep the standards in place for MCS.** Do not adopt the proposed MCS exemptions in §3123(c)(5), §3125(h), §3127 and §3128(c). Every publicly or ratepayer-funded DC charger, whatever its connector or power, should keep the same 97% uptime standard, reporting, and driver outage channel. That keeps the status quo and a level playing field for all hardware and all future vehicles.
2. **Ease the consequences, not the requirement.** Through December 31, 2028, an MCS port that reports below 97% should not by itself be grounds for repayment, reduction or cancellation of a grant. Instead, the funding recipient would file a short corrective-action plan with the Commission. Staff confirmed the standards are enforced "through our grant terms" [6], so this relief can be written into grant agreements and program manuals (e.g., EnergIZE §§6.1.2, 6.4.4 [18]) without removing the standard.
3. **Phase in hourly reporting if needed; don't waive it.** If hourly reporting or OCPP 2.0.1 certification is a real near-term burden for first-generation MCS, give MCS ports a later compliance date for hourly data. Keep semiannual uptime reporting and the outage channel from day one. The Center for Sustainable Energy likewise recommended delays rather than "outright and indefinite exemptions" [15].
4. **Make MCS performance visible.** Publish MCS uptime in the Commission's charging-network-provider metrics alongside CCS and NACS [6]. Fleets choosing a truck platform, and hosts choosing hardware, should see how each performs. That is the pressure that keeps every standard at least as reliable as the status quo.

5. **Treat all ports on shared hardware the same.** Keeping the standard for MCS resolves the questions TRC and EV Realty raised about shared MCS/CCS cabinets [16][17]: every port follows the same rules.
6. **Consider interoperability in funding.** In coordination with CARB, consider whether publicly funded MCS-only trucks and sites should include access to existing public CCS truck charging (dual-connector hardware or adapters), consistent with what vehicle manufacturers already provide in other markets [10].

We appreciate the Commission's work to support heavy-duty electrification and its commitment to reliable, publicly funded charging. We would welcome the opportunity to discuss these comments.

Respectfully submitted,

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References

- [1] Rempel, Cullen, Bryan & Cezar, "Reliability of Open Public Electric Vehicle Direct Current Fast Chargers," 2022 (field study Feb 12–Mar 7, 2022). <https://arxiv.org/abs/2203.16372>
- [2] AB 2061 (Ting, 2022), Senate Energy, Utilities & Communications Committee analysis. https://seuc.senate.ca.gov/sites/seuc.senate.ca.gov/files/ab_2061_analysis.pdf
- [3] CEC, Initial Statement of Reasons (2025 rulemaking), citing AB 2061 and AB 126 (PRC §25231.5). Docket 22-EVI-04, TN 264469.
- [4] CEC, "Navigating the EV Charging Data and Reliability Standards" (Apr 2026), TN 269392; E&E News, "California approves first-in-the-nation EV charger reliability rules" (Oct 2025).
- [5] California Trucking Association comments (Oct 25, 2023), TN 252768; Final Statement of Reasons, §3121(a)(21), §3125(g), TN 269173.
- [6] Transcript, EV Charger Data and Reliability Implementation Workshop (July 22, 2026), TN 271847.
- [7] Express Terms, TN 271852, and Initial Statement of Reasons, TN 271849 (Aug 7, 2026).
- [8] Tesla Basecharger specifications (tesla.com, Sept 2026): 120 kW DC / 125 kW AC, 150 A, 180–1000 VDC; price: Electrek (May 1, 2026), <https://electrek.co/2026/05/01/tesla-semi-charging-business-megacharger-basecharger-pricing/>
- [9] Tesla, Inc., "MCS Exemption – Letter of Support" (Sept 21, 2026), TN 272878, p. 2.
- [10] Not a Tesla App, "Tesla's European Semi: Photos, Videos, and What's Different" (IAA Transportation 2026). <https://www.notateslaapp.com/news/4695/teslas-european-semi-photos-videos-and-whats-different>
- [11] Tesla, Semi charging for business, "What is Included – Maintenance Package" (tesla.com, accessed Sept 2026); see also <https://evchargingstations.com/chargingnews/tesla-semi-charging-business/>
- [12] U.S. DOE Alternative Fuels Data Center station locator, California DC fast stations tagged for heavy-duty vehicles, public access (accessed Sept 24, 2026). <https://afdc.energy.gov/stations>
- [13] Trucking Dive, "Greenlane receives \$15M grant for EV truck charging." <https://www.truckingdive.com/news/greenlane-receives-15-million-dollar-grant-EV-truck-charging/726530/>
- [14] Electric Vehicle Charging Association comments (Sept 24, 2026), TN 272921.
- [15] Center for Sustainable Energy comments (Sept 22, 2026), TN 272888.
- [16] TRC comment, "Question on MCS Exemption for Shared MCS-CCS Charge Systems" (Aug 18, 2026), TN 272031.
- [17] EV Realty comments (Sept 22, 2026), TN 272897.
- [18] CALSTART, EnergiIZE Implementation Manual (May 30, 2025), §§6.1.2, 6.4.4, 6.5. https://energiize.org/wp-content/uploads/2025/11/FINAL_EnergiIZE_IM_Q1_2025_5.30.25.pdf
- [19] Tesla Semi factory event, Sparks, Nevada (Sept 24, 2026), remarks by Dan Priestley, Tesla Semi program lead; transcript approx. 24:08–29:25.