

DOCKETED

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September 25, 2026

California Energy Commission
715 P Street
Sacramento, CA 95814

Re: Notice of Proposed Action—Rulemaking to Amend Electric Vehicle Charger Reliability Standards (Docket No. 22-EVI-04)

Dear Commissioners:

ABB E-mobility appreciates the opportunity to comment on the 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.

ABB E-mobility is a global leader in electric vehicle charging solutions. The company serves leading automotive OEMs, charging network operators, fleet operators, and commercial customers worldwide. With approximately 1,400 employees globally, ABB E-mobility has sold more than 74,000 high-power chargers and helped electrify over 10,500 charging sites worldwide. ABB E-mobility also maintains a comprehensive service organization providing ongoing monitoring, troubleshooting, and maintenance support for charging infrastructure in the field.

ABB E-mobility recognizes the importance of providing reliable EV charging as EV adoption continues to grow in California—not only in the light-duty market but also in the expanding medium- and heavy-duty sector. Transportation accounts for an estimated 50 percent of California’s greenhouse gas emissions, and medium- and heavy-duty trucks, which are only around 7% of vehicles on the road, account for a disproportionate share of emissions, particularly along high-traffic corridors near warehouses, ports, and other commercial facilities. With the Air Resources Board reporting that nearly 23% of all new Class 2b–8 vehicle sales in California are zero-emission, deploying megawatt charging infrastructure is essential to reaching the state’s goal of 100% zero-emission M/HD on-road vehicles by 2045 where feasible.

Among the amendments suggested to Article 2, we commend the proposal to exempt publicly funded, publicly available chargers with Megawatt Charging System (MCS)/SAE J3271 connectors from the state’s reliability requirements for electric vehicle charging infrastructure. The Society of Automotive Engineers (SAE) identifies MCS as a separate technology from CCS1 and J3400 and a unique communications protocol, J3271. The scale and maturity of the North American market for medium- and heavy-duty electric vehicles and that for light-duty electric vehicles, as well as for EV charging, warrant differentiated approaches to regulation. The light-duty electric vehicle market is substantially advanced by comparison with the medium- and heavy-duty sector, which is reflected in

the level of EV charging-related regulations promulgated by several states, vehicle registration rates, availability of models by duty type, and charging infrastructure deployed.

While charging technology is rapidly advancing, the availability of heavy-duty trucks is only beginning to expand in North America, and the market itself is commercially promising but still nascent.¹ Charging network operators have announced ambitious plans to meet growing demand for heavy-duty electrification, but only a few megawatt charging capable stations for the heavy-duty trucking sector have been deployed at scale along travel corridors in the United States.² As noted in the CEC's proposal, California's reliability standards should not apply uniformly because of the implementation differences between light-duty and heavy-duty vehicle types, charging technologies by segment, and level of market development.

Thank you for the opportunity to submit comments on these important topics. ABB E-mobility shares the California Energy Commission's interest in expanding EV infrastructure for medium- and heavy-duty electric vehicles.

If you have any questions or wish to discuss any of these topics further, please do not hesitate to contact me at matthew.chen1@us.abb.com.

Sincerely,

Matthew E. Chen

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ABB E-mobility

¹ For example, ABB E-mobility's OM X-Series, designed for the heaviest duty cycles, is a distributed charging system that replaces isolated clusters with one coordinated site architecture, scaling from 800 kW to 10 MW and beyond, across more than 100 charge points.

² [Electric Freight is Taking Shape – Atlas EV Hub](#)