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Comment Received From: Cory Bullis
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Coalition Support for EV Charging Reliability Tracking & Analysis

Additional submitted attachment is included below.



Good for the Economy.
Good for the Environment.



May 14, 2021

Ms. Patricia Monahan
Commissioner, Energy Commission
1516 Ninth Street
Sacramento, CA 95814

Re: Support for Tracking and Measuring EV Charging Reliability

Dear Commissioner Monahan,

On behalf of the undersigned organizations, we strongly support and encourage the Energy Commission's (Commission) focus on tracking and measuring EV charging station reliability in terms of uptime, as it is critical to ensuring EV drivers have a consistent and quality charging experience.

The EV market is at a critical inflection point – while the state has deployed a significant amount of charging stations, it still has a long way to go to achieve both its 2025 and 2035 charging deployment goals. Increasing consumer confidence in EVs as accessible and convenient greatly depends on the convenience and reliability of accessing charging stations.

However, there is a common perception among drivers and in the industry that many public chargers are poorly maintained or broken entirely, sometimes for months at a time. Broken chargers do not serve drivers well, and create a perception of EVs being unreliable, to the frustration of consumers.

The state's Zero-Emission Vehicle Market Development Strategy (Strategy) calls out EV charging station reliability as a key activity for the Commission to lead on, and further recognizes "charging system resilience" as a potential metric to track the overall health of California's charging network. Going further, the Commission's "action plan" to

implement the Strategy once again states that it will collaborate with stakeholders to track and measure EV charging reliability. We strongly applaud both documents identifying reliability as a key need in the charging space, and we appreciate your agency's leadership in this area.

Given the Commission's work on "counting chargers", assessing reliability is an important metric to understand how those chargers are contributing to the state in achieving the spirit of accessibility implicit in its charger deployment goals. If a charger is unreliable, it is not supporting the accessibility of charging. Furthermore, as a complementary component of the Commission's SB 1000 (Lara, 2018) work, the Commission should also consider tracking if there are disparities in reliability based on the demographics outlined in its initial report, as insights from that data could help inform the equitable accessibility of charging stations beyond just their geographic distribution.

All drivers deserve a consistent and high-quality charging experience across networks and regions of the state. Data on EV charging reliability will be a powerful tool to inform the quality of the state's infrastructure from an EV drivers' perspective and only further the state's progress in achieving its zero-emission vehicle adoption goals.

Thank you for your consideration,

Cory Bullis
Senior Public Affairs Specialist
FLO

Gina Goodhill
Policy Director
Clean Power Alliance

Miles Muller
Attorney, Climate and Clean Energy
Natural Resources Defense Council

Steve Douglas
Vice President, Energy & Environment
Alliance for Automotive Innovation

Samantha Houston
Senior Vehicles Analyst
Union of Concerned Scientists

Andy Wunder
Western States Advocate
Environmental Entrepreneurs

Peter O'Connor
Senior Policy Manager
Plug In America

CC: Tyson Eckerle, Governor's Office of Business and Economic Development
Hannah Goldsmith, Governor's Office of Business and Economic Development
Chair Liane Randolph, Air Resources Board
Board Member Davina Hurt, Air Resources Board
Board Member Gideon Kracov, Air Resources Board