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Electric Vehicle Charging Association (EVCA) Comments on Electric Vehicle Charging Infrastructure Reliability Workshop

Additional submitted attachment is included below.

Electric Vehicle Charging Association

INNOVATION FOR CLEAN MOBILITY

April 4, 2022

California Energy Commission
715 P Street
Sacramento, CA 95814

Docket: 21-TRAN-03
Project Title: Zero Emission Vehicle Infrastructure Barriers and Opportunities

RE: Electric Vehicle Charging Association (EVCA) Comments on Electric Vehicle Charging Infrastructure Reliability Workshop

To Whom It May Concern,

The Electric Vehicle Charging Association (EVCA) is a not-for-profit organization comprised of leaders throughout the value chain of the electric vehicle (EV) charging industry to advance the goal of a clean transportation system in which the market forces of innovation, competition, and consumer choice drive the expeditious and efficient adoption of EVs and deployment of EV charging infrastructure. We appreciate the opportunity to provide comments on the California Energy Commission (CEC) workshop on Electric Vehicle Charging Infrastructure Reliability.

California has adopted ambitious and aggressive policies to phase in electric vehicles and reduce its reliance on fossil fuels. Fulfilling these goals requires a significant increase in charging infrastructure deployment and requires confidence that this infrastructure is operational and accessible.

EVCA agrees that the State should develop and adopt reliability metrics and standards for public charging infrastructure to ensure customers are confident with the charging infrastructure. Reliability plays a critical role in electric vehicle adoption and retention as it ensures consumer confidence in electric vehicles. We urge the CEC to use minimum reliability and operational requirements to prevent stranded assets and ensure this investment is successful, rather than attempting to prescribe how charging hardware and network vendors communicate or develop their business models. Furthermore, it would be appropriate for any reliability standard to be prospective, so as not to impact existing projects and create confusion in the market.

The Association is working on a number of detailed recommendations that we will submit to the CEC in the upcoming weeks. However, we would like to raise a number of issues now for your consideration.

We hope that the CEC, at a minimum, will consider the following related to Docket 21-TRAN-03:

1) Define the list of exclusions in calculating uptime.

The CEC should work collaboratively with EVSPs in an open, transparent process to identify and define the list of exclusions to be adopted. We would recommend a series of meetings with program staff that we can help to facilitate with the industry to work through the details of an exclusion list. The goal would be to present a list of important items from the industry's perspective and allow commission staff to ask questions in real time. This collaborative process should ensure the commission is comfortable developing a thoughtful approach to this issue.

2) Require funding recipients to report to the CEC data using a standardized formula.

Inconsistent data will prevent the industry and the State from assessing overall performance of current stations and undermine the ability to plan for future infrastructure needs. Standardization will ensure that the industry is aware and able to report in a universal manner to support a uniform evaluation of reliability.

Specifically, the funding recipient or owner and operator of the charging station should have ultimate responsibility for both reporting and compliance with any standards. Charging network, hardware, and operations and maintenance providers all can and should assist in providing information to the owner and in some instances may be able to assume this responsibility, however, ultimate responsibility should rest with the owner of the station.

3) Include potential reliability standards from the Federal Highway Administration (FHWA) in their final decision.

The FHWA anticipates it will release federal reliability standards in May of 2022. As the CEC is fully aware, consistent and coordinated standards allow the industry to minimize cost, deploy more infrastructure, and reduce confusion. If the State were to issue a series of decisions that are counter, or inconsistent, with federal guidelines the ability for the industry to scale would be jeopardized. It is our hope that the CEC would work with the appropriate federal representatives to understand their approach and include their standards/criteria into the State's final decision.

Ultimately, we would request that state and federal standards be aligned and consistent.

4) Require robust operation and maintenance plans to support meeting any reliability standard and uptime data reporting requirements.

A well-developed operations and maintenance model could include a number of features, including, but not limited to:

- Preventative maintenance and monitoring
- 24/7/365 customer support
- 24/7/365 connectivity and monitoring of the charger network
- Service ticketing and procedures to ensure service and operational issues are addressed in a reasonable timeframe
- Service level agreements

- Demonstrated access to technicians capable performing maintenance on stations

Additionally, operations & maintenance should be an eligible cost in state grant funding.

5) Infrastructure incentives.

As the industry continues to grow, bringing more private capital to bear to expand our infrastructure footprint and drive down costs for customers, it would be appropriate for the CEC to use public funding to support improvements regarding reliability. While reliability is important for many reasons, it is also important to make sure the costs associated with attaining these standards don't drive up costs for customers. This would defeat the purposes of the State's overall climate and transportation goals. Therefore, as the CEC develops incentive programs for ZEV infrastructure, they should directly build out tools to support improving reliability outcomes where appropriate.

In particular, infrastructure incentives should be provided to upgrade and replace aging infrastructure in order to increase station reliability and deliver a positive driver experience.

We thank the CEC for this opportunity to comment on their open docket. As mentioned above, we are still working through recommendations related to other questions the CEC has identified in Docket 21-TRAN-03. Those additional recommendations will be submitted in the ensuing weeks.

Sincerely,

Reed Addis
Governmental Affairs
Electric Vehicle Charging Association