

DOCKETED

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Instituting a Reliability Standard for All Publicly Funded Charging Stations

Additional submitted attachment is included below.

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April 13, 2022

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

Re: Instituting a Reliability Standard for All Publicly Funded Charging Stations

Dear Commissioner Monahan,

We applaud your agency's focus on EV charging reliability via its March 11 workshop. A reliable charging experience is critical to supporting the state's EV and charging deployment goals, otherwise we risk consumers losing interest in EVs due to the inconvenience of broken chargers. Mainstream consumers are not likely to be as tolerant as early EV adopters. As noted by the Air Board's recent technology review, its survey for drivers revealed that charging station reliability was a top issue. Given that the state has been investing billions into this industry for the past decade, it is reasonable to expect EV charging stations to meet certain standards and specifications, including a reliability standard.

This is why we authored Assembly Bill 2061, the EV Charging Reliability Transparency Act. The bill would require the following:

1. Charging networks must report charging station uptime data if public funds (including ratepayer funds) are used to install a station.
2. The Energy Commission must use this data to analyze overall EV charging station reliability and publish this analysis through its AB 2127 report.
3. The Energy Commission must use data to analyze if there are disparities in accessing reliable charging stations and publish this analysis through its SB 1000 report.
4. Encourages the Commission to consider implementing tools, including uptime requirements, among other things, to ensure charging stations are reliable and to support further EV adoption.

If the Commission does not collect this data and conduct these analyses, we as a state will not be able to meaningfully address issues related to charging station reliability, nor will we know how to increase the public benefit provided by public dollars to install stations.

It's critical that the Commission develop a robust data collection and reporting framework for charging stations, otherwise it could have skewed or inconsistent data that undermines its analysis. That is why Assembly Bill 2061 further specifies the following features of a reporting framework:

- Occurs at the individual station level, limiting the exemptions to excluded time
- Occurs for a minimum of five years

- Occurs every 12 months
- Requires charging companies to report on behalf of funding recipients
- Requires charging companies to use a standardized reporting formula developed by the Commission

We strongly encourage the Commission to maximize measuring the “true” reliability of charging stations and thus limiting the number of exemptions to how charging networks calculate uptime. While we understand the need to provide flexibility to charging networks and not unfairly penalize their networks’ reliability score due to issues they cannot control (as indicated by AB 2061), as a state must prioritize the interests of EV drivers. Should the Commission allow too many exemptions to calculating station reliability, it will dilute the impact of the Commission’s work to increase overall infrastructure reliability, our state’s EV adoption targets, and undermine the goals of AB 2061.

Finally, AB 2061 strongly encourages the Commission to institute firm uptime requirements because they are the best tool to minimize consumer frustration with broken chargers. They are a well-defined, quantifiable metric. We applaud the precedent the Commission set on this policy via its previous grant solicitations for multi-family housing and rural charging respectively. Furthermore, the Federal Highway Administration’s National Electric Vehicle Formula program also requires a greater than 97 percent uptime guarantee at the individual station level, of which California will receive \$384 million in these funds over five years. We encourage the Commission to expand robust uptime requirements (97 percent uptime or greater) to all public funding sources in the state, to the benefit of our drivers, EV adoption goals, and climate goals. Your work on this issue could not have occurred at a more critical time, and we thank you for your attention to this topic.

Thank you for your consideration,



PHILIP Y. TING
Assemblymember, 19th District



Eloise Gomez Reyes
Assembly Majority Leader, 47th District

CC: Tyson Eckerle, Governor’s Office of Business and Economic Development
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