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EVCA Comments on Electric Vehicle Charging Infrastructure Reliability Standards

Additional submitted attachment is included below.

Mr. Dustin Schell
Air Resources Engineer
California Energy Commission
715 P Street
Sacramento, CA 95814

Docket: 22-EVI-04
Project Title: Electric Vehicle Charging Infrastructure Reliability

RE: EVCA Comments on Electric Vehicle Charging Infrastructure Reliability Standards

To Mr. Schell,

The Electric Vehicle Charging Association (EVCA) is a non-profit trade organization of 19 leading EV charging industry member companies and two zero-emission autonomous fleet operators. EVCA's mission is to advance the goal of a clean transportation system in which the market forces of innovation, growth, competition, and consumer choice drive the expeditious and efficient adoption of EVs and deployment of EV charging infrastructure.

EVCA supports the California Energy Commission's (CEC) efforts to develop reliability metrics and standards for public charging infrastructure. In order to fulfill California's electric vehicle adoption goals, the state will need a significant increase in charging infrastructure deployment and drivers will need to feel confident that this infrastructure is operational and accessible. Reliability plays a critical role in electric vehicle adoption and retention as it ensures consumer confidence in electric vehicles.

We appreciate the opportunity to comment on the electric vehicle charging infrastructure reliability standards and offer the following comments for your consideration.

1. Reliability standards should be consistent across all state entities and should consider pending guidance from the Federal Highway Administration on the National Electric Vehicle Infrastructure (NEVI) program minimum standards. Consistent and coordinated standards allow the industry to minimize cost, deploy more infrastructure, and reduce confusion.

2. Reliability should be measured using "uptime" defined as, "the amount of time the charger's software and hardware are both capable of dispensing electricity."

3. Chargers installed using public funds, including ratepayer funds, should adhere to uptime requirements developed by the funding entity, in

collaboration with the electric vehicle charging industry, in a way that is consistent with AB 2061.

4. Funding recipients should report charging station uptime annually for six years, using a standardized formula developed by the funding entity.

   The formula should be consistent across all funding entities. 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.

5. The CEC should allow exclusions to any uptime requirements due to upstream infrastructure failures (e.g., grid, cellular, and internet outages), vandalism, vehicle interoperability issues, preventive maintenance, supply chain issues, and force majeure as these are outside the control of the station operators.

6. Even though there should be allowable exclusions, the CEC should still collaborate with electric vehicle charging companies on tracking the prevalence of those upstream points of failure to understand reliability within the entire charging ecosystem.

7. All uptime data should be held confidentially by the funding entity, and any public facing reports on EV charging reliability using this uptime data should anonymize and aggregate the data so that no individual charging provider is identifiable and proprietary information is protected. EV charging data is a powerful tool: it informs companies' proprietary infrastructure deployment strategies and advances their respective business models. Such competitive intelligence is an asset owned by each company. Therefore, after assessing what information is publicly accessible, the CEC should work bilaterally with companies to understand sensitivities around sharing certain information, such as session level data under the dynamic data collection.

8. The CEC should reconsider the proposed consumer survey program which would require CEC funded chargers to bear a sticker/sign with a QR code linked to a survey used to report down chargers. The proposed sticker/sign would request the consumer to report any charger issues by calling the charging station provider and to report the issue to the CEC using a survey linked via a QR code. We are concerned that by requesting the consumer to do both, the consumer would instead only report the charger issue using only the QR code, never alerting the charging station provider of the issue. We look forward to learning more about this concept the CEC has proposed and how it may contribute to shared EVSE reliability goals.

9. As the CEC considers new standards to improve EVSE uptime, we encourage the CEC to also consider the additional tools and resources at its disposal that could enhance the reliability of California's charging network. We would encourage the CEC to use unbiased and fully transparent methodologies to not skew the overall analysis of the EVSE ecosystem.

   Targeted programs that address common points of concern across the EVSE ecosystem could help promote the longevity of existing charging equipment and encourage cost-effective upgrades at sites to better meet California drivers' evolving needs. These issues are particularly germane to first-generation, legacy EVSE that may be at or near the end of its useful life.

   Relatedly, CEC has also indicated during a September workshop that it is exploring "pay for performance" provisions as part of its forthcoming NEVI program solicitation operational requirements. AB 2061 clarifies that the CEC can pursue incentives, including operation and maintenance incentives, to increase station uptime and EVCA looks forward to working with the CEC to assess how resources can be deployed strategically to improve reliability across California's charging network.

Thank you for your consideration.

Sincerely,

Reed Addis
Governmental Affairs
Electric Vehicle Charging Association

CC: Gia Vacin, Governor's Office of Business & Economic Development, ZEV Infrastructure Unit