

DOCKETED	
Docket Number:	22-EVI-04
Project Title:	Electric Vehicle Charging Infrastructure Reliability
TN #:	247433
Document Title:	ChargerHelp! Inc Comments on EV Charging Reliability Standards
Description:	N/A
Filer:	System
Organization:	Smantha Ortega
Submitter Role:	Public
Submission Date:	11/11/2022 5:43:03 PM
Docketed Date:	11/14/2022

*Comment Received From: Smantha Ortega
Submitted On: 11/11/2022
Docket Number: 22-EVI-04*

ChargerHelp! Comments on EV Charging Reliability Standards

To whom this may concern,

Please accept ChargerHelp!'s attached comments on the EV Charging Reliability Standards Workshop held on October 21, 2022.

Additional submitted attachment is included below.



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

November 11, 2022

Re: Docket # 22-EVI-04 - Comment on the Workshop on EV Charging Infrastructure Reliability Standards

Dear Mr. Schell,

ChargerHelp! is a technology company that enables the on-demand maintenance of Electric Vehicle Supply Equipment (EVSE). We are a minority and woman-owned company headquartered in Los Angeles, CA. ChargerHelp! partners with charging companies to repair chargers in multitude of environments and on different complex technologies, these services range within software, firmware, and hardware interoperability. We ultimately support our partners to improve the reliability of the chargers deployed throughout the United States.

We appreciate the opportunity to comment on the proposed reliability standards for California's EV charging infrastructure. We further appreciate the commitment of the Commission to continue to provide stakeholder engagement to develop an equitable approach to maintaining and operating the charging equipment which will lead to further job creation throughout the state. Considering California's aggressive goals to invest \$4 billion dollars to the infrastructure, it is crucial that the guidelines the state adopts for the reliability and operability of the chargers are robust and consistent throughout all communities. We are thrilled to see the maintenance requirements provided with past and future solicitation improving and evolving. Though it is moving towards the right direction we offer the following recommendations to be incorporated in future rulemakings and solicitations.

1. We strongly encourage the Commission to closely align any reliability and uptime requirements from the Federal Highway Administration standards to state ratepayer funded incentives. This will ensure consistency with Assembly Bill 2061 and other state programs.
2. As in the federal guidance, allow operations and maintenance to be a continued eligible expense. Other expenses under this could include, commissioning for replaced units, EV charging infrastructure field monitoring and assessments.
3. The definition for uptime used by the FHWA requires the chargers' software and hardware are both "*online*". We recommend this word to be replaced by "*operable*", as it would be more appropriate with measuring hardware systems.
4. We encourage the commission to measure uptime by the minute.
5. Consider "force majeure" and "preventative maintenance" to be a qualified *exclusion* to the uptime calculation. Chargers becoming inoperable due to extreme weather conditions/events is by

nature an unavoidable event. Additionally, in the course of performing preventative maintenance, technicians may have to power off charging equipment to conduct reboots, etc that could cause a charger to not be accessible to an EV driver. We believe these should be allowable excluded events.

6. In contrast, we do not believe that events such as supply chain, labor shortages, and vehicle interoperability should be considered as *excluded events* in the uptime calculation as these are issues that are able to be resolved fairly quickly. As for labor shortage, as an example, we have seen a high rate of interest from the public to become industry experts as EVSE Maintenance Technicians, and standing up a workforce for this occupational classification can average six weeks.
7. Additionally, “site access restrictions” should also not be considered as an eligible *exclusion* for the uptime calculation. These restrictions are typically permissible by the solicitation and do not speak true to the chargers’ operability.
8. Performance Standards/ Definitions- We encourage the Commission to provide more information on the intent to incorporate a minimum payment success rate of the EVSE as a separate metric area. We recognize that the payment systems may need to improve but we want to ensure that the payment systems errors/success are part of the overall EVSE uptime calculation.
9. We recommend that a service level agreement is incorporated into the funding solicitations. If the funding recipient is not the charging provider, require the funding recipient to have a SLA with the charging provider. This will ensure that those funding recipients have the support they need to maintain the chargers operating at a high rate.
10. Current agreements indicate that a maintenance technician should be dispatched at a timely manner. We recommend that a service level agreement should be more prescription on the timeframe that charger issues should be resolved following a 48-hour response time to a down or broken charger.
11. Customer surveys seem to be a proactive approach to incorporating EV driver participation, though we do not believe this could be a consistent way for the Commission, owners and operators of the chargers to manage uptime. We look forward to further information from the commission on this matter.
12. We support the mandatory data collection from AB 20061. Field monitoring could be a great employment opportunity to support the growing maintenance technician pool. We look forward to further development of additional monitoring and reporting methods.

Thank you for your consideration.

Sincerely,

Samantha Ortega
Manager, Government Relations
ChargerHelp Inc