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January 17, 2023

Dear Assemblymember Ting and Assembly Majority Leader Reyes,

Thank you for your letter dated December 9th and submitted to the California Energy Commission's (CEC's) public docket. We appreciate your engagement on the CEC's upcoming implementation of Assembly Bill (AB) 2061 (Ting). Access to highly reliable electric vehicle (EV) charging infrastructure is a priority for the CEC. As California transitions to zero-emission vehicles, it is critical that drivers from all regions of California and income levels can rely on the charging network to function reliably.

We appreciate and value your continued engagement on reliability standards and the implementation of AB 2061. As stated, the CEC believes that EV chargers must maintain a high uptime level to be considered reliable. The CEC has included reliability standards as a condition for grant funding in recent EV charging solicitations and intends to continue doing so. For example, chargers installed through the CEC's California Electric Vehicle Infrastructure Project (CALeVIP) 2.0 light-duty EV charging infrastructure rebate project will have to meet a 97% minimum uptime requirement. As you noted, proposed regulations for public chargers installed through the National EV Infrastructure (NEVI) Formula Program would require chargers to be operational a minimum of 97% of the time.

The CEC will set EV charger reliability reporting standards pursuant to AB 2061 through a public rulemaking process that incorporates stakeholder feedback. We anticipate that the CEC will formally open this rulemaking at an upcoming Business Meeting. Charger uptime is a vital statistic to understanding the reliability of EV charging infrastructure, and we agree that setting an uptime definition that allows excessive exclusions would create loopholes and erode the value of charger uptime statistics. Other failures, such as interoperability or payment failures can also frustrate drivers and we seek to better understand those driver experience metrics too. Collecting and publishing metrics on these reliability problems along with uptime is essential to understanding and improving the customer experience.

Finally, we agree that it is important to understand the reliability of charging station infrastructure in California. We intend to use a public process to develop an open protocol for field testing including conducting and publishing the results. We will also examine the use of other data sources such as commercial

databases, voluntary reporting, and consumer feedback to better understand charger reliability and the customer experience.

We welcome your comments and participation in the development of these tools. Please do not hesitate to contact me or Hannon Rasool, Director of the Fuels and Transportation Division (hannon.rasool@energy.ca.gov) with any further recommendations or questions. We are also available to meet with your staff.

Thank you,

Hannon Rasool