

DOCKETED

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Electrify America Comments on June 2023 NEVI Workshop

Additional submitted attachment is included below.



July 7, 2023

California Energy Commission
715 P Street
Sacramento, CA 95814

RE: 22-EVI-03 -- Electrify America Comments on June 2023 NEVI Workshop

Electrify America appreciates the opportunity to comment on California’s workshop on updated guidance for its National Electric Vehicle Infrastructure (NEVI) Program Deployment Plan. Electrify America operates the nation’s largest open network of DC fast chargers serving the range of electric vehicles (EVs), with over 3,500 ultra-fast chargers at nearly 825 stations nationwide. Electrify America has a significant footprint in California, with over 1,000 ultra-fast chargers open to the public at 250 locations in the state.

In finalizing its NEVI solicitation, Electrify America encourages California to align its third-party data sharing requirements with the Federal Highway Administration (FHWA) standards. This avoids creating a patchwork of different state standards to comply with, which can increase the administrative burden of data sharing and cause delays in providing data.

Electrify America also appreciates California’s prudence in not prematurely requiring use of the NACS connector for participation in its NEVI solicitation at this time. While the market may be moving in that direction¹, there are additional steps required to ensure successful deployment of chargers with NACS cables and connectors. Electrify America is encouraged by recently announced plans by the Society of Automotive Engineers (SAE)² and the Charging Interface Initiative (CharIN)³ to standardize the NACS connector. In addition to time for the standardization process, charging companies and charger manufacturers need time to develop a pipeline of NACS equipment which meets the NEVI program’s requirements including UL standardization, compatibility with non-Tesla EVs and compliance with the Build America, Buy America requirement. Electrify America looks forward to providing feedback on future solicitations and to being a resource to the California Department of Transportation (Caltrans) and the California Energy Commission (CEC) on this issue as needed.

¹ Electrify America, “Electrify America to add NACS connector by 2025,” media release, June 29, 2023, <https://media.electrifyamerica.com/en-us/releases/223>

² SAE International, “SAE International Announces Standard for NACS Connector,” media release, June 27, 2023, <https://www.sae.org/news/press-room/2023/06/sae-international-announces-standard-for-nacs-connector>

³ CharIN, “CharIN Stands Behind CCS and MCS, but also supports the standardizations of Tesla NACS,” media release, June 12, 2023, <https://www.charin.global/news/charin-stands-behind-ccs-and-mcs-but-also-supports-the-standardization-of-tesla-nacs/>



Electrify America has made a strong commitment to ultra-fast, reliable, and non-proprietary charging in the State of California. The NEVI program has the potential to greatly increase the ultra-fast charging available to California drivers and support the continued transition to zero-emission vehicles in the state. Electrify America looks forward to the release of the solicitation and to continued work with Caltrans and the CEC on its deployments under NEVI.

Respectfully submitted,

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