DOCKETED	
Docket Number:	22-EVI-04
Project Title:	Electric Vehicle Charging Infrastructure Reliability
TN #:	252561
Document Title:	Gonzalo M Stabile Comments - Availability Calculation
Description:	N/A
Filer:	System
Organization:	Gonzalo M Stabile
Submitter Role:	Public
Submission Date:	10/10/2023 2:14:59 PM
Docketed Date:	10/10/2023

Comment Received From: Gonzalo M Stabile Submitted On: 10/10/2023 Docket Number: 22-EVI-04

Availability Calculation

1) The proposed formula does not account for the actual availability of the unit, which is not binary. The traditional approaches established by ANSI and the International community includes degraded and derated modes which result in partial uptime of a unit. Should the unit output be derated or degraded, and none of the power modules failed, if it can still meet the EV requested power level then it would be considered fully available. This is particularly important with stations that have several degraded modes, Signet, ABB, and those with actively cooled dispenser cables which default to a lower output if cooling status can not be verified. Under the proposed formula operators like Electrify America would likely report an Uptime of 40-60% when their true uptime is less than 15% because users have reported more than 75% the output is less than that demanded by the vehicle.

2) 15min intervals are unlikely to work for DCFC units as each interval is likely going to have a start or end session attributed to it leading to calculation errors and partially available periods which will be difficult to aggregate and process.

3) Consider creating or recommending use of common reporting tags such as GADS.