

**DOCKETED**

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*Comment Received From: Gillian Gillett, California Integrated Project, Caltrans  
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**Cal-ITP comments regarding 22-EVI-04 - equity and usability improvements**

*Additional submitted attachment is included below.*



October 25, 2023

California Energy Commission  
Fuels and Transportation Division  
715 P Street, Sacramento, CA 95814  
[FTD@energy.ca.gov](mailto:FTD@energy.ca.gov)

Dear CEC Fuels and Transportation Division:

The California Integrated Travel Project (Cal-ITP), a program managed by the California Department of Transportation (Caltrans) on behalf of the California State Transportation Agency (CalSTA) dedicated to removing barriers to sustainable travel in California, is pleased to provide feedback on the *CEC Proposed Regulations for EV Charger Inventory, Utilization, and Reliability Reporting*, published October 2023. We commend the CEC team on its efforts to improve the quality and reliability of data on public electric vehicle chargers, and support this regulation as a key enabler for the expansion of low-carbon mobility across California. At Cal-ITP, we have focused on the impact of payments and data on the efficiency and customer experience of mobility across California and believe that the CEC can play an important role not only in improving the quantity and quality of data available to the state, but also in enabling a more equitable, convenient and transparent experience for EV drivers themselves, regardless of income.

While CEC's primary objectives are to ensure that chargers are *present* and *technically operable* where they are needed for equitable access, we encourage the CEC to also consider collecting data that supports a better user experience, which can have significant impact on whether the chargers are *usable* by all they are intended to serve. Cal-ITP is eager to build a partnership with the CEC to address these issues and suggest the following for the CEC to consider:

**1. Commit to publicly reporting the inventory data collected, both through a statewide dashboard and accessible via API for real-time usage by third parties.**

Locating a functioning EV charger and easily viewing accurate information about chargers is harder than it should be. Currently, many charger brands provide users with an app that may only show their own chargers, or which only display chargers from other affiliated charging networks. Many drivers still rely on crowdsourced data and cannot view specific information like the number of available charge points, accepted payment methods, or additional fees (such as entry to paid lots with chargers) on the ubiquitous, digital wayfinding platforms Google Maps and Apple maps. The inventory data the CEC is collecting would be invaluable to these third-party services, as it applies to more chargers than are covered by the reporting standards outlined in NEVI, which are also still under development through the [EV-ChART initiative](#). The CEC should seize the opportunity this regulation presents, acknowledge the public value of the data that will be collected, and commit to publishing it on California's [Open Data Portal](#) in the timeliest manner possible. The CEC should also consider that the data format this reporting utilizes should be easily digestible by major third party applications, and should consider engaging directly with these players and other important stakeholders like the NREL and the Joint Office of Energy and Transportation to develop and standardize this reporting capacity in a complementary manner to existing datasets and formats, such as the [Open Charge Point Interface](#) (OCPI).

**2. Consider pricing information and payment transparency as central to achieving the key equity objectives this regulation is intended to support.**

A key goal of this regulation is to supply the CEC with the data it needs to "support equitable access to reliable EV chargers by drivers unable to charge EVs at their own residences." In addition to reliability,



key barriers to equitable access include payment method acceptance and cost transparency. While California regulations prohibits membership-only payment methods at chargers, a gap will remain for some time, and there is not yet reliable data about payment method acceptance that is readily available to drivers across all charging provider networks. As the CEC builds out its inventory reporting requirements, we strongly encourage the addition of (at minimum) a payment method acceptance field (which is also included in the reporting requirements to the NREL established in section 44268.2 of the California Health and Safety Code), in addition to yes/no fields that identify (a) whether there is truly *free access* to the charger (e.g. not in a paid parking lot), and (b) if the charger is coded with Merchant Category Code 5552 for Electric Vehicle Charging, which would ensure that restricted prepaid cards and rewards and loyalty cards recognize the payment transaction. In the utilization reporting, we encourage the CEC to add an additional data field (understanding this may also fall under confidential business information) about the percentage of transactions performed by each type of payment method accepted. The data that could be collected using the additions outlined above would be indispensable for future policy and regulatory decision-making, in particular as the CEC assumes regulatory responsibility for payment methods at EV chargers starting in 2028 as defined in SB123.

The two recommendations above would allow the CEC to support a more accessible and transparent user experience at EV chargers for Californians regardless of their income, while providing critical data to support the agency as you take on a larger role in regulating charging infrastructure. Cal-ITP is eager to expand upon the preliminary guidance offered here and appreciates your consideration of our comments. Further, we look forward to collaborating in the coming months and years on these topics as well as other equity-impacting elements related to the usability of California's EV charging ecosystem.

Kind regards,

A handwritten signature in cursive script that reads 'Gillian Gillett'.

Gillian Gillett  
Chief, Data & Digital Services Division  
Program Manager, California Integrated Mobility, Caltrans