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Alliance for Automotive Innovation Comments

Please find the attached comments from the Alliance for Automotive Innovation on docket 22-EVI-04.

Additional submitted attachment is included below.



October 25, 2023

Hon. Patricia Monahan
California Energy Commission
1516 Ninth Street
Sacramento, CA 95814

Re: Draft Staff Report on Regulations for Improved Inventory, Utilization, and Reliability Reporting

Dear Commissioner Monahan:

The Alliance for Automotive Innovation (“Auto Innovators”)¹ appreciates this opportunity to comment on the *Tracking California’s Electric Vehicle Chargers: Regulations for Improved Inventory, Utilization, and Reliability Reporting Draft Staff Report* (the “Draft Report”). We commend the CEC for a thorough and thoughtful analysis of existing capabilities for tracking EV charging reliability and uptime. Reliable charging stations are critical, as customers must be able to depend on functional public EV chargers when they need to charge. While we appreciate the tracking and reporting requirements outlined in the Draft Report as these can be helpful tools in improving the overall customer experience, we are concerned that the reporting requirements do not also come with an uptime requirement.

EV charging stations must be secure, equitable, and accessible for all EV drivers. The U.S. Department of Transportation Federal Highway Administration (FHWA) included a 97 percent uptime for all National EV Infrastructure funded chargers.² Auto Innovators supported FHWA’s standard for publicly funded chargers and encourages California to implement similar requirements for state-funded public chargers. Just as federally funded EV chargers must have a minimum uptime requirement and offer redundancy, so too should those funded by states. Non-operational chargers do not support EV

¹ From the manufacturers producing most vehicles sold in the U.S. to autonomous vehicle innovators to equipment suppliers, battery producers and semiconductor makers – Alliance for Automotive Innovation represents the full auto industry, a sector supporting 10 million American jobs and five percent of the economy. Active in Washington, D.C. and all 50 states, the association is committed to a cleaner, safer and smarter personal transportation future. www.autosinnovate.org.

² Alliance for Automotive Innovation comments to FHWA’s NPRM on NEVI standards. Found at <https://www.regulations.gov/comment/FHWA-2022-0008-0264>

customers and can negatively impact the market. It is unreasonable that state-funded charging stations be non-operational for any extended period of time.

We also encourage the CEC to look for opportunities to improve overall reliability from the customer's perspective. Uptime is one parameter that should be measured, but successful charging sessions should also be tracked, with a focus on the customer's ability to pay for and get a charge as expected, at the expected power level, without unexpected problems such as early termination. We appreciate CEC collecting data on the number of successful charging sessions per attempt. This type of data would not be captured on the uptime calculation but could prove just as useful. In addition to collecting charging session data, California should identify root cause for failed attempts and identify solutions to address them. It would also be beneficial to measure charge rate data over a specified period of time to ensure that the charge rate that the station should be providing is being met.

Auto Innovators appreciates the opportunity to provide these comments and is eager to work with the CEC to ensure that the deployment of state-funded EV charging stations is efficient and equitable.

Respectfully Submitted,



Dan Bowerson
Senior Director, Energy & Environment