

**DOCKETED**

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## **PowerFlex Comments EVSE Uptime Reporting**

*Additional submitted attachment is included below.*



October 25, 2023

California Energy Commission  
Docket Unit, MS-4  
715 P Street  
Sacramento, CA 95814

**Re: Docket No. 22-EVI-04—PowerFlex Comments on October 9, 2023 Workshop on Proposed Regulations for EV Charger Inventory, Utilization, and Reliability Reporting and September 28, 2023 Draft Staff Report Tracking California’s Electric Vehicle Chargers**

California Energy Commissioners and Staff:

PowerFlex appreciates the opportunity to comment on the California Energy Commission’s (Commission’s) September 28, 2023 Draft Staff Report Tracking California’s Electric Vehicle Chargers (Draft Staff Report) and the October 9, 2023 Proposed Regulations for EV Charger Inventory, Utilization, and Reliability Reporting workshop (workshop). PowerFlex is a leading installer, owner, and operator of distributed energy resources (DERs) including electric vehicle supply equipment (EVSE). With more than 10,000 EVSE installed in California, we have significant experience with customer experience and reliability and are very supportive of the Commission’s efforts to collect data on EVSE reliability. With this experience and perspective in mind, PowerFlex offers the following comments.

**Definition of “Installed”:**

Definition 27 in the Draft Staff Report proposes defining “Installed” EVSE as:

“Installed” means attached or placed at a location and available for use for a charging session. The date a charger is installed is the date it is first available for use for a charging session.

PowerFlex supports clearly defining when an EVSE first becomes available for use, but PowerFlex recommends using the phrase “placed in service” rather than “installed” to describe this. In the context of construction, “installed” typically means the hardware components of a system have been positioned and secured at their intended location, but this does not also imply that the EVSE is available for use. EVSE hardware can be installed and still require additional time to energize the project before it is available for use. Thus, referring to the date when an EVSE became available for use as “placed in service” could avoid confusion with the date hardware components were secured at the site.

**Definition of “Successful Charging Session”:**

Definition 43 in the Draft Staff Report proposes defining “Successful Charging Session” as:

“Successful charging session” means, following a charge attempt, a customer’s EV battery is charged to the state of charge the customer desires and is disconnected manually by the customer or by the EV’s onboard software system terminating the charging session, without an additional charge attempt.

PowerFlex supports providing the energy drivers need and request as they plug in to charge their vehicles, but not all vehicles currently communicate in a way that provides the state of charge (SoC) of the vehicle’s battery to the charger. While forthcoming communications standards, such as ISO 15118-2,



could allow vehicles to share SoC with chargers, this standard is not yet fully implemented in all chargers and vehicles.<sup>1</sup> Thus, not all chargers installed January 1, 2024 and after will know what a vehicle's SoC is when it plugs in to charger. Rather, PowerFlex suggests that a successful charge session be defined as delivering the amount of energy (kWh) requested by the driver. Additionally, it should be clear that if a driver manually terminates the charging session before the charger has delivered the requested kWh, this is not considered an unsuccessful charging session. Thus, PowerFlex proposes revising the definition of "Successful Charging Session" to be as follows:

"Successful charging session" means, following a charge attempt, a customer's EV battery ~~is charged to the state of charge the customer desires~~ received the energy requested and is disconnected manually by the customer or by the EV's onboard software system terminating the charging session, without an additional charge attempt. ~~If the customer manually stops a charging session before the energy requested is delivered, the charging session is excluded from the Failed charging session count.~~

PowerFlex appreciates the opportunity to provide these comments in response to the Commission's September 28, 2023 Draft Staff Report and October 9, 2023 workshop and looks forward to collaborating with the Commission on this topic in the future. Respectfully,

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<sup>1</sup> Beginning July 1, 2023, all Commission-funded EVSE must be ISO 15118 "Ready", meaning the chargers have the required hardware to allow 15118 communication between vehicles and chargers. But this functionality is not yet required to be active, and it will be some time before all vehicle and charging manufacturers have 15118 hardware and software fully implemented.