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*Comment Received From: Jacqui Irwin  
Submitted On: 10/25/2023  
Docket Number: 22-EVI-04*

**RE- Regulations for Improved Inventory, Utilization, and Reliability Reporting for California's Electric Vehicle Chargers**

*Additional submitted attachment is included below.*



# California Legislature

October 25, 2023

David Hochschild, Chair  
California Energy Commission  
715 P Street  
Sacramento, CA 95814

RE: Regulations for Improved Inventory, Utilization, and Reliability Reporting for California's Electric Vehicle Chargers

Chair Hochschild:

We are writing in response to the California Energy Commission's (CEC) draft regulations for improving inventory, utilization, and reliability reporting standards of the state's electric vehicle (EV) chargers proposed in publication CEC-600-2023-055 following the passage of Assembly Bills (AB) 2127 (Ting, Chapter 365, Statutes of 2018), AB 2061 (Ting, Chapter 345, Statutes of 2022), and AB 126 (Reyes, Chapter 319, Statutes of 2023). While we are aligned with the Commission's dedication to improving transparency into the deployment and reliability of EV chargers in the state, we have concerns that the proposed reliability standards fall short of reaching the goals set out by AB 2127, AB 2061, and potentially AB 126.

By 2026, roughly \$1.7 billion state dollars will have been invested in publicly accessible EV charging infrastructure. Yet, despite these investments, the lack of charger reliability continues to stand in the way of the state and its 2035 zero-emission vehicle goals. Currently, the CEC, through recent grant funding opportunities, and the National Electric Vehicle Infrastructure (NEVI) program have begun to require an average annual uptime of 97 percent per charging port for EV charging companies receiving either public or NEVI program funds for their infrastructure. In line with these efforts, we urge the CEC to also adopt an annual uptime of 97 percent for **all** EV charging grant recipients, including those outside of NEVI, making use of a crucial tool that was given to the CEC through AB 2061 and AB 126. While we understand that implementation of this requirement may take time, we believe that it is imperative to set this regulation sooner rather than later. We are, however, supportive of the CEC's intention to publicly rank the reliability of major EV charging networks in these assessments, believing it is important for major networks to be held responsible for the reliability of their charging infrastructure.


Additionally, we are concerned that biennial reporting standards will fail to provide inventory and reliability data in a timely manner that allows the CEC to respond to outstanding deployment and reliability concerns. As stated in the draft regulations, the California will need over 2 million operational public and shared EV chargers by 2035. However, the CEC lacks accurate information on the current number of EV chargers in the state, with current reporting mechanisms like the Alternative Fuels and Data Center also failing to report the number of EV chargers with precision. It is crucial that California has current data on EV charger inventory and reliability needed to ensure the effectiveness of current and future state investments in this industry. With

the proposed regulations, we fear that these assessments will be occurring too infrequently for the CEC to adopt any additional tools to increase the uptime of chargers, or direct future funding to communities lacking adequate EV charging infrastructure, and would urge the CEC to, at a minimum, consider quarterly reporting of inventory and reliability data.

Lastly, with the passage of AB 126, the CEC must now set standards for notifying customers about the availability and accessibility of publicly available EV charging infrastructure. As the CEC evaluates what regulations to implement for this requirement, we urge the CEC to focus on the availability of **real time** data for EV customers. The current charging station application marketplace lacks cohesion and comprehension in available EV charging station data, leaving customers with a level of frustration and mistrust in the state's EV charging infrastructure. Providing the availability and operational status of EV charging stations to customers in real-time is paramount to building the consumer trust needed to reach the state's 2035 zero emission vehicle goals. The NEVI program's regulations importantly requires its grant recipients to report real-time data on availability and accessibility to third parties through application programming interfaces (APIs), providing a model for the CEC to consider building upon.


We appreciate both your work on these regulations and consideration of this request, and look forward to partnering with the California Energy Commission on these crucial regulations.

Sincerely,



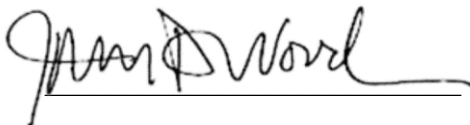
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