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*Comment Received From: David Moller  
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**Marin/Sonoma EV Squad Comments on CEC Proposed Regulations for EV Charger Inventory, Utilization, and Reliability Reporting Octo**

*Additional submitted attachment is included below.*



**Docket:22-EVI-04**

**Marin/Sonoma EV Squad Comments on CEC Proposed Regulations for EV Charger Inventory, Utilization, and Reliability Reporting October 25, 2023**

**Dear California Energy Commission:**

Thank you for the opportunity to comment on the California Energy Commission's *Proposed Regulations for EV Charger Inventory, Utilization, and Reliability Reporting*. While the proposed regulations are a start, they fail to adequately address the significant reliability issues in public EV charging infrastructure that will hold back the transition to EVs.

Presently, when using open-system public chargers, EV drivers frequently encounter unresponsive kiosks, broken equipment, payment systems that do not work, and other issues that prevent successful charging. Yet, the proposed regulations are missing the key performance requirements, third-party verification, and effective enforcement measures that are necessary to resolve these problems.

Although the draft report *Tracking California's Electric Vehicle Chargers* (Sept 2023) indicated staff considered setting charger reliability standards in addition to reliability reporting requirements, such standards and requirements seem to be missing in the proposed regulations.

We urge that the final regulations be revised to include the following:

- Uptime requirements
- Third party uptime verification
- Enforceable consequences for noncompliance

Clearly, Charging Network Providers are capable of resolving the many problems with the public charging system, but only through enforceable regulation is this likely to happen. Please don't miss this opportunity to accelerate the transition to EVs by assuring that EV drivers have a seamless and reliable charging experience every time!

Sincerely,

**David Moller, P.E.**

The Marin/Sonoma Electric Vehicle Squad, a subgroup of Climate Reality Bay Area formed in 2018, to advance policy that will accelerate the transition to EVs.