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## InCharge Energy 22-EVI-04 Comment

*Additional submitted attachment is included below.*

California Energy Commission
Docket Unit, MS-4
Docket No. 22-EVI-04
715 P Street
Sacramento, California 95814

October 25, 2023

**RE: 22-EVI-04 and Electric Vehicle Charging Infrastructure Reliability - Comments in Response to Draft Staff Report Tracking California's Electric Vehicle Chargers**

Dear California Energy Commission staff,

InCharge Energy appreciates the opportunity to provide comment on the California Energy Commission's (CEC) Draft Staff Report, Tracking California's Electric Vehicle Chargers: Regulations for Improved Inventory, Utilization, and Reliability Reporting. InCharge recognizes the CEC staff's significant effort on this draft report and regulation, and we share the CEC's commitment to providing our fleet customers with reliable charging infrastructure and service – not only throughout California, but also across the United States and Canada.

Industry veterans with over 100 years of combined electric vehicle and charging experience formed InCharge Energy in 2018. The world leader in e-mobility, ABB, made a 60% majority stake investment in InCharge in 2022. Together, we are full-service, turnkey charging infrastructure providers. InCharge Energy specializes in commercial EV fleet charging and charging for medium- and heavy-duty (MDHD) vehicles.

Our customers in the MDHD fleet market include Sysco, Ryder, UPS, and Quality Custom Distribution. InCharge helps these partners and others with all steps of their electrification infrastructure process. We provide site planning, installation of InCharge and ABB charging hardware, energy and fleet management software, support, service, and financing solutions. From freight delivery to school buses to autonomous vehicles, InCharge provides fully integrated, scalable solutions.

*InCharge MDHD and fleet charging*

*InCharge EV chargers*

As a prime example of InCharge's capabilities related to school bus fleets, the Moreno Valley Charging Project assisted in converting 38 MVUSD school buses from diesel to electric, improving air quality and cutting greenhouse gas emissions in a high-pollution disadvantaged community (DAC). This project serves the largest electric school bus fleet in California, which transports 31,000 students to and from 42 schools, and is expected to save the district over $600,000/year in fuel and maintenance costs.


*Moreno Valley USD Charging Project*

**CEC Inclusion of Private Charging Infrastructure in Draft Report and Regulation**

Given our focus on MDHD fleets, InCharge puts the highest importance on providing reliable charger uptime. The close integration of our hardware, software, and service labor allows our team to efficiently resolve an event remotely, or to swiftly send technicians on site. By directly performing repair and maintenance services with our own on-staff technicians and providing error notifications and direct dispatching through our InControl software, InCharge produces the industry's highest real-world uptime as measured by kW available for vehicles. It is because of this high uptime standard that fleets trust InCharge with their charging infrastructure.

Along with ABB E-Mobility, InCharge has significant concerns regarding the CEC's proposed reporting requirements' inclusion of "behind-the-fence", non-publically available charging. Public disclosure of private fleets' charging utilization would expose confidential business information and sensitive commerical activity data. While InCharge shares the CEC's goal of providing fleets with a reliable charging experience, we find that our private fleet partners are strongly incentivized by their own business needs to maintain high uptime on their chargers. Unlike with public charging, private operators have various methods to achieve their uptime needs through working with partners like InCharge. Including "behind-the-fence" charging in this regulation introduces new administrative burdens and data privacy concerns where best uptime practices and quality service offerings are already in place and providing reliable private infrastructure.

We thank you for this opportunity to respond to the CEC's Draft Staff Report. InCharge looks forward to continuing the conversation with the CEC and other stakeholders to refine the regulations and their implementation, ensuring that they not only serve to ensure reliable public charging infrastructure, but also align with the unique charging needs of private, MDHD fleets.

Sincerely,

Terry O'Day

Chief Operating Officer
InCharge Energy