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Proposed EV Charging Infrastructure Reliability Regulation

Additional submitted attachment is included below.

October 25, 2023

To: California Energy Commission

Re: EV Charging Infrastructure Reliability, Docket: 22-EVI-04

CALSTART applauds the effort of the California Energy Commission to draft this staff report on EV charging infrastructure reliability. A reliable EV charging network is vital to the transition to zero emission vehicles and towards achieving the state's climate goals.

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CALSTART is the administrator for block grant incentives on behalf of the California Energy Commission, including EnergIIZE Commercial Vehicles and Communities in Charge. To align the design and requirements of these projects with the draft regulation, we would like to offer the below observations and questions.

Section 3120: Scope

- (a) refers to charging technology for AC Level 2s and DCFCs. The definitions for these are provided in the subsequent section. Is this scope intended to include or exclude bidirectional chargers, wireless charging systems, megawatt charging systems, and other new EV charging technologies? As currently defined, it could be interpreted that bidirectional chargers and megawatt charging systems could be included in the current definition of DCFCs. Wireless charging systems vary by type and manufacturer, though many are in AC; it may or may not have overlap with the current definitions. If these are to be included, we would recommend evaluation of the timeline in which these types of equipment may be ready for OCPP compliance.

Section 3121: Rules of Construction and Definitions

- (14) "Direct Current Fast Charger (DCFC)" – Appendix A defines a "direct current fast charger" as a charger that enables rapid charging by delivering direct-current (DC) electricity directly to an EV's battery. Within the EnergIIZE project, both AC Level 2 and DCFC are eligible technologies, however, we have seen requests for DC charging equipment at 20kW that is not significantly faster than AC Level 2 at 19kW. We are aware that across utility programs and within industry, the definition of DCFC can vary, with some prescribing a lower limit.
- (7) "Charging port"- Appendix A defines "charging port" as the system with a charger that charges one EV. A charging port may have multiple connectors, but it can provide power to charge only one EV through one connector at a time.
- We would like to ask for clarification on this definition where a port has multiple connectors. Is this meant to describe where there may be dual ports, or where a connector may additionally have an

adapter? As written this could be interpreted that although a charger may be dual port, only one connector may be utilized one at a time. We recommend adding clarifying language such as "Wherein a charger is constructed with dual ports and dual connectors, simultaneous utilization of both charging ports may occur."

- (17) "Electric Vehicle" – Appendix A defines "electric vehicle" as a vehicle that is either partially or fully powered on electric power received from an external power source and for the purposes of this regulation excludes golf carts, bicycles, and other micromobility devices. Pursuant to Section 3120 (a) and Section 2131 (b)(1, 14, and 17), it appears that off-road equipment would also not be included in the scope of this regulation. Is that interpretation correct? Is the definition based on intended use or actual use? For example, a freight port may have charging equipment primarily used by off-road yard tractors but for which on-road yard tractors and other vehicles may also have access to the charging equipment.

Section 3122: The Recordkeeping and Reporting Agent

- (2) "shall retain an enrolled charging network provider to serve as the recordkeeping and reporting agent" – For applicable funding programs, does this mean the eligible technology and software would need to be limited to only those charging network providers that are officially enrolled?

Section 3123: Semiannual Reporting Requirement

- (a) "shall collect and submit to the Executive Director a semiannual report" – Existing CEC block grants have data collection requirements for incentivized chargers, which vary but may be monthly or quarterly. As incentives do not typically cover 100% of costs, it is common for funding to be stacked when possible, such as Carl Moyer and EnergIIZE, or federal funding and Communities in Charge. We also noticed that changes to AB126 specifies certain data reporting requirements which may be similar or in addition to what is required here. Is it possible to consolidate these requirements into a single submission? If not, how would duplicate reporting be managed?
- (2, 3) It may be helpful to include a field for funding source. This could help with any duplicate reporting and to verify where compliance has been met by the funding entities. A way to look up and match up charger IDs would also be helpful in monitoring compliance. We would also recommend a field for identifying as a disadvantaged community (DAC) or low-income community (LIC), for aspects of those definitions where address alone may not capture enough information, such as for a qualifying low-income household or property owned by a tribal nation.
- (2)(J) Charger's primary use, GVWR for medium- and heavy-duty. Within EnergIIZE and HVIP, the definition in use for medium- and heavy-duty is a gross vehicle weight rating of 8,501 and above

(Class 2b). We would also recommend a use case for "shared charging" and/or "charging as a service".

Section 3129: General Administration

- (a) Will there be a grace period for timeline of first submission while the system for reporting is being built or determined?

Thank you for your time and attention, and your effort in striving towards a reliable charging network.

Sincerely,

Alyssa Haerle
Director of Infrastructure Incentive Administration
CALSTART