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EV Connect comments

Additional submitted attachment is included below.



May 14, 2024

EV Connect strongly supports the Commission's efforts towards increasing EV charger reliability and forming more enforceable performance standards. We are eager to offer our insights to clarify the pivotal role of networks in both the deployment and maintenance of EV charging infrastructure in California, along with proposing measures aimed at ensuring maximum charger reliability.

Founded in 2009, the EV Connect network platform has enabled the management of over 5000 chargers that are currently active in the state of California. In the Second Draft Staff Report Tracking and Improving Reliability of California's Electric Vehicle Chargers, it was observed that not all network providers are also charging station operators. A prime example of this is EV Connect. Our business model generally excludes that scenario, as we rarely act as a charging station operator.

As such, we would like to provide the following comments about the proposed method of reporting charger reliability metrics based upon Section 3129: Requirements for Funding Entities:

(1) We understand that the reliability metrics may be based on any information available associated with funding recipients, charging station operators and charging network providers. We believe these are valid means of assessment.

(2) In order to determine reliability performance standards, the CEC report outlines that CEC staff intends to rank the reliability of the major EV charging networks publicly, including detailed network uptime information in biennial reports. We believe that a more accurate metric for reliability would be reflected in a ranking of the Charge Point Operators (CPOs), also known as the charging station operators. In some cases, the network software and the CPO are the same. However, it is important to distinguish the differences: the CPO is the entity responsible for maintenance and upkeep of the charging stations, which cannot be enforced by the network software provider if they are not the CPO. By highlighting the network and not the operator that is responsible for maintenance, it would provide misinformation to the public. It is critical to ensure the reliability uptime mandate falls to the Charge Point Operator (CPO), not the software network provider.

(3) We recommend that, in forming future funding programs, CEC include funding for ongoing Operation & Maintenance during the 6-year period when reliability reporting is required. In order to support charging station operators in meeting the 97% uptime requirement, they need support throughout the lifetime of their charger to maintain reliability.

Thank you for the opportunity to provide feedback on this important legislation. The open workshop process ensures that all EV drivers in California have positive public EV charging experiences.

Sincerely,

Daniel Bryant

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