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General Motors comments on proposed EV charging infrastructure reliability regulations

Additional submitted attachment is included below.

May 15, 2024

California Energy Commission
Docket unit, MS-4
715 P Street
Sacramento, CA 95814

Submitted Electronically to docket number 22-EVI-04

RE: 22-EVI-04, Electric Vehicle Charging Infrastructure Reliability – General Motors Comments on Proposed Electric Vehicle Charging Infrastructure Tracking and Reliability Regulations

Dear California Energy Commissioners and Staff:

General Motors Company (GM) thanks the California Energy Commission (CEC) for the opportunity to respond to the Second Draft Staff Report Tracking and Improving Reliability of California's Electric Vehicle Chargers ("Staff Report"). As an OEM also deeply invested in charging infrastructure, we support the CEC's efforts to accelerate statewide electric vehicle (EV) infrastructure deployment, and we applaud the focus on convenience, reliability, and customer experience. The Staff Report addresses the data and operational work that is needed to support EV drivers with dependable and easy-to-locate public EV charging stations. The Staff Report also points out key issues that can lead to a lack of consumer confidence. GM supports these proposed regulations and encourages swift approval and implementation. Below are additional specific comments on the proposed regulations.

GM's vision for the future is all-electric and we are putting significant resources into accelerating this transition. We are bringing a wide range of new vehicles to market in different vehicle classes and price points. The vehicles, however, are just one part of this equation. EV buyers must have confidence in public EV charging stations and in their ability to go wherever they want to go in an EV. This means the network should be as convenient, dependable, and easy to use as today's conventional fuel network, with stations functioning as expected from the perspective of the EV driver. Well-designed reporting requirements for public charging stations, paired with strong reliability requirements and collaborative industry efforts, such as the National Charging Experience Consortium (ChargeX), can help the industry make progress on this complex issue.

Below are comments on the key requirements of the Staff Report.

GM Supports harmonization with NEVI on the 97 percent uptime requirement for state and ratepayer-funded public chargers, effective January 1, 2024.

GM agrees uptime is one important piece of the overall reliability puzzle. We therefore appreciate and support the general alignment with the National EV Infrastructure (NEVI) program on uptime calculations and definitions. We note that CEC is only proposing to exclude downtime stemming from communications outages for chargers that "default to free," grid

power loss, and natural disasters and believe this is a reasonable, customer-centric caveat that helps align CEC's proposed calculation with the NEVI program.

GM agrees that a 90 percent "successful charge rate" requirement for networked state and ratepayer-funded public chargers, effective 2026 is a key reliability component.

GM agrees that the true measure of reliability in charging stations is the actual completion of a successful charging session. If the station has electricity and appears to be available but the customer cannot charge their vehicle, uptime does not matter. This lack of quality charging has a significant impact on customers deciding to drive electric. Holding the charging port to a minimum successful charge attempt rate (SCAR) of 90 percent will support greater customer confidence in the overall charging network. The definition of a successful charge is a reasonable goal.

Data collection requirements for charger quantity, locations, usage, real-time availability, and accessibility is a critical component of the overall requirements and GM supports this for public charging stations. However, we recommend CEC consider the additional burden that will be placed on small private fleets and owners of non-networked systems.

The charging network provider of public L2 and DCFC charging stations can easily collect this information and provide it to the site host/station owners or designated reporting agent. This should be no issue for larger public charging station operators. However, from an equity standpoint, users of private networked and non-networked chargers and site hosts, who may be small electric fleet owners, workplaces, apartments, and small businesses, may find it more burdensome to comply. In some cases, the network operator may require additional fees to provide this data to the station owner, or the site owner may not have the personnel resources to monitor non-networked chargers. GM recommends that the CEC consider both the financial ability of the site owner to obtain this data and provide technical and financial assistance for qualified parties to comply with this regulation. It would be unfortunate if these additional charging reporting requirements for a private fleet caused a company or other entity to delay converting to an electric fleet.

Thank you for the opportunity to respond to the CEC second draft staff report. This is an important and timely issue; abundant and quality charging is how we will continue to grow EV adoption. GM is encouraged by CEC's holistic, customer-centric approach and we look forward to continued engagement on this issue.

Sincerely,

Kathy Knoop
Manager, EV Infrastructure Policy