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Comment Received From: JEnergy Innovation: Policy & Technology LLC
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Energy Innovation comment - data and performance standards are needed

Please see attached document.

Additional submitted attachment is included below.

May 15, 2024

California Energy Commission
Re: Docket No. 22-BSTD-01
715 P Street
Sacramento, CA 95814
docket@energy.ca.gov

Dear commissioners and staff,

On behalf of Energy Innovation: Policy & Technology LLC, a non-partisan energy and climate policy think tank, I extend our appreciation for your diligent efforts developing the proposed data and charger reliability standards discussed during your April 30, 2024, workshop.¹ The proposal is an important step toward building the consumer confidence in public charger dependability that will be important to achieving urgent state transportation electrification goals.

Getting it right starts by remedying the current lack of quantitative data on charger performance. The proposed measure's requirement for data disclosure addresses this need for more publicly accessible information. Such transparency will not only aid consumers and policymakers but will also benefit high-performing charging enterprises by making their quality more visible.

The CEC's proposal thoughtfully aligns with emerging federal regulations, such as a 97 percent uptime requirement. However, while uptime is a valuable metric, it is insufficient on its own. The reason is that EV drivers may encounter charging problems even if a charger is not 'down' because of charger timeouts or other technical glitches. As the staff report explains: "Errors at 'up' chargers anecdotally appear to be common and may not be remedied by a 97 percent uptime requirement."² The proposed 90 percent minimum successful charge attempt rate will effectively address the limitations of uptime-only requirements.

¹ Learn more about our organization at: <https://energyinnovation.org/about-us/>

² Per page 35 of the *Second Draft Staff Report*, April 9, 2024, Report No. CEC-600-2023-055.

For the foregoing reasons, we conclude the CEC's proposed data and reliability standards represent a vital step toward ensuring a positive public charging experience for EV drivers. Thank for your work on this important initiative.

Sincerely,

A handwritten signature in black ink, appearing to read "Chris Busch". The signature is fluid and cursive, with the first letters of the first and last names being capitalized and prominent.

Chris Busch, Ph.D.
Director, Transportation & Senior Economist
Energy Innovation: Policy & Technology, LLC

