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*Comment Received From: Electric Era Technologies, Inc.  
Submitted On: 5/15/2024  
Docket Number: 22-EVI-04*

## **Electric Era Comments on Second Draft Staff Report**

*Additional submitted attachment is included below.*

**ELECTRIC ERA TECHNOLOGIES**  
**3847 1ST AVE S**  
**SEATTLE, WA 98134**

May 15, 2024

California Energy Commission  
715 P Street  
Sacramento, California 95814

***RE: Electric Vehicle Charging Infrastructure Reliability - Second Draft Staff Report: Tracking and Improving Reliability of California’s Electric Vehicle Chargers (Docket No. 22-EVI-04)***

Dear CEC,

Electric Era Technologies, Inc. (Electric Era) is a US-based EV charging company that produces intelligent, battery-backed DCFC systems, and we appreciate the opportunity to provide comments on the Second Draft Staff Report on establishing EV charger reliability regulations.

**BACKGROUND**

Electric Era provides intelligent battery-backed DCFC systems that are specifically designed to address the industry’s persistent reliability issues and to minimize impact on our overburdened grid.

Our patented charging system – called PowerNode – combines power from the grid with power from our battery energy storage system (BESS) to provide charging power beyond the grid’s limit. PowerNode also autonomously calibrates how much power to draw from either or both sources to reduce grid impact and operational costs.

PowerNode also harnesses technology to ensure a reliable charging experience. PowerNode remotely detects and recovers from errors or faults, and our fully-integrated ecosystem provides us with full visibility into the entire station, including errors that have normally been difficult for charging companies to detect.

**GENERAL COMMENTS**

EV drivers deserve a more reliable charging experience, and Electric Era is supportive of the CEC’s efforts to strengthen reliability standards. In particular, we applaud the CEC’s efforts to establish standards to improve charging-session (SCAR) reliability, as uptime does not capture the real-life experience of many EV drivers.

Our comments are limited to a couple suggestions to improve the proposed regulations:

- 1) Being able to exclude a Communication Network Outage from downtime should not depend on making the charger free. Many EV chargers today, like Electric Era's, support offline payments to ensure that network outages do not prevent EV drivers from paying and charging. As such, in the event we do experience a network outage, we are concerned that this provision would essentially force us to make our chargers free – even if an EV driver can still pay and charge normally – just so that it can be excluded from our downtime calculations.
- 2) We recommend that CEC clarify/confirm that the OCPP data to be transmitted via API be limited to those identified in the regulations. Requiring all OCPP data to be transmitted via API would be too onerous for both the agencies receiving the data and for companies like Electric Era, which communicates far more optional data at a higher rate locally via OCPP (roughly 100 times more OCPP data for internal operations than is typical for many CPOs).

Thank you again for the chance to provide feedback on the Second Draft Staff Report. We are encouraged by the CEC's proposed regulations, and we look forward to working with the CEC to ensure a more reliable charging experience for Californians. Please do not hesitate to reach out if we can be of further assistance.

Sincerely,



Brian Kyuhoon No  
Head of Government Affairs  
Electric Era