

DOCKETED	
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Project Title:	Electric Vehicle Charging Infrastructure Reliability
TN #:	256414
Document Title:	Coalition for Clean Air Comments - 2nd Draft Proposed Regulations for Electric Vehicle Charger Inventory, Utilization, and Reliability Reporting -- Support
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*Comment Received From: Coalition for Clean Air
Submitted On: 5/15/2024
Docket Number: 22-EVI-04*

**2nd Draft Proposed Regulations for Electric Vehicle Charger
Inventory, Utilization, and Reliability Reporting -- Support**

Additional submitted attachment is included below.



May 15, 2024

Dustin Schell, Air Resources Engineer
California Energy Commission
1516 Ninth Street Sacramento, CA 95814
Docket #: 22-EVI-04

**Re: 2nd Draft Proposed Regulations for Electric Vehicle Charger Inventory, Utilization,
and Reliability Reporting -- Support**

Dear Mr. Schell,

The Coalition for Clean Air has long supported transportation electrification as a vital pathway to addressing California's air pollution and climate crises, and we advocate for public funding for ZEV infrastructure. Much evidence supports the conclusion that access to reliable charging is a key factor in helping drivers to make the transition to battery-electric vehicles (hydrogen fueling is also badly in need of reliability standards). We need to assure that drivers can count on the charge that they need when they arrive at a station.

For this reason, we support the CEC's draft proposed regulations for EV Charger Inventory, Utilization, and Reliability Reporting. In particular, we urge you to retain in the final rule the proposed standards for 97% uptime and 90% successful charge attempt rate (SCAR). We agree with the CEC that the SCAR can help understand issues for the consumer that may not be well reflected by uptime metrics, including failed payment attempts and interoperability failures. We believe that the six-year timeline for the requirement, starting January 1, 2026, is appropriate as it allows the industry time to comply with the regulations and offers a long enough duration to build a better picture of the charging experience and incentivize industry players to improve reliability.

We also support the proposed data-sharing requirements. All publicly available networked Level 2 and DC fast chargers that received state and ratepayer funding and were installed on or after January 1, 2024, should have to share data, so that regulators and the public can evaluate charger reliability and utilization.

Respectfully,

A handwritten signature in black ink that reads "Bill Magavern". The signature is written in a cursive, flowing style.

Bill Magavern
Policy Director