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Comments of the California Municipal Utilities Association on EV Charging Infrastructure Reliability

Additional submitted attachment is included below.

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California Energy Resources Conservation and Development Commission
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RE: Docket No. 22-EVI-04 Electric Vehicle Charging Infrastructure Reliability

The California Municipal Utilities Association (CMUA) respectfully provides the following comments to the California Energy Resources Conservation and Development Commission (Energy Commission) regarding the second draft of the Regulations for Improved EVSE Inventory, Utilization, and Reliability Reporting (Draft Regulations).

CMUA is a statewide organization of local public agencies in California that provide essential public services including publicly owned electric utilities (POUs) that operate electric distribution and transmission systems that serve approximately 25 percent of the electric load in California. California's POUs are committed to, and have a strong track record of, providing safe, reliable, affordable, and sustainable electric service and the infrastructure needed to facilitate California's clean transportation goals. CMUA agrees that improved information on charger inventory and reliability will improve our collective understanding of California's charger needs. To that point, supports the Draft Regulations as a good first step toward improving charger reliability and grid planning.

A Successful Charge Attempt Should Not Be Based on Charger Run Time

CMUA recognizes that successful charge attempt rate (SCAR) and charger uptime are important metrics for evaluating reliability. However, CMUA supports the comments of the California Electric Transportation Coalition (CalETC)[1] stating that the arbitrary 5-

[1] CalETC Comments on Second Draft of EVSE Reporting Regulation, submitted on May 15, 2024.

minute minimum runtime to be considered a successful charge attempt should be removed. An minimum charge time of 5 minutes risks not accounting for a charge beyond 5 minutes that ends in an error code. A successful charge attempt should be identified as a charge *of any duration* that does not end by a defined error code.

Reporting Mandates for Non-Public Chargers Should be Limited to Inventory Data

California's electric vehicle (EV) growth targets require a combination of public and private charger installations. To best support the efforts of property owners to support the state's growing need for chargers, California must recognize the adverse impact of additional administrative burdens imposed on owners of non-public chargers. To reduce the adverse incentive that such administrative burdens may place on property owners, the Energy Commission should limit this reporting requirement for non-networked, behind-the-fence non-public chargers to inventory data only. Owners of non-public chargers have the incentive to maintain these private chargers to support a high uptime target. This is particularly important in helping to support the use of battery electric medium- and heavy-duty vehicles but applies whether the chargers are used for commercial fleet operations or multi-family installations. However, the burden of reporting utilization or reliability data for behind-the-fence chargers clearly exceeds the public benefit because these chargers would not be available to the public. To best facilitate additional charger installations, these regulations should look to minimize the effort required of EVSE site hosts, regardless of whether the charger received any state or ratepayer funding. Limiting the mandatory reporting for behind-the-fence chargers to inventory data best meets the public need without imposing undue, and potentially stifling regulatory burdens on private charger owners.

The Regulations Should Not Impose an Arbitrary Time Limit on Maintenance.

The Draft Regulations propose to impose a time limit on preventive maintenance or repair of vandalized chargers. Supply chain and labor shortages have proven to be particularly difficult in the electric infrastructure space. Mandating a fixed cap on maintenance and repairs risks penalizing EVSE hosts even though they are facing obstacles beyond their control.

If the Energy Commission looks to impose a cap, CMUA supports CalETC's assertion in this early state of the regulation, collecting data on how long maintenance or repairs take is the best approach. This data would better inform any time limit that the Energy Commission may consider in a future rulemaking.

Conclusion

CMUA appreciates the opportunity to submit these comments and looks forward to collaborating with the Energy Commission on this important issue.

Respectfully submitted,

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