

**DOCKETED**

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*Comment Received From: Samantha Ortega  
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**ChargerHelp Comments Tri-State CFI RFI Docket 24-EVI-01**

*Additional submitted attachment is included below.*



ChargerHelp, Inc

June 10, 2024

California Energy Commission  
715 P Street  
Sacramento, California 95814

**RE: Docket No. 24-EVI-01 - ChargerHelp Comments for the Project Proposal Ideas and Considerations for California, Oregon, and Washington's Medium- and Heavy-Duty Joint Application for the U.S. Department of Transportation's Charging and Fueling Infrastructure Discretionary Grant Program**

Dear Sarah Sweet,

ChargerHelp appreciates the opportunity to submit project recommendations under the joint partnership between the California Energy Commission (CEC), the California Department of Transportation (Caltrans), the Oregon Department of Transportation (ODOT), and the Washington State Department of Transportation (WSDOT) for the US Department of Transportation's Charging and Fueling Infrastructure (CFI) Discretionary Grant Program. We commend California for taking the lead in the Tri-State medium- and heavy-duty (MHD) corridor proposal. Developing an accessible and reliable MHD infrastructure within these states is critical to addressing the reduction of greenhouse gas emissions and improving the air quality for all residents.

ChargerHelp is a technology company committed to ensuring electric vehicle (EV) charging station reliability. Our technology and field service workforce enable the on-demand inspection, diagnostics, maintenance, and repair of EV charging stations, including both software and hardware. We are a woman and minority-owned company that helps solve the industry-wide problem of downed and broken Level 2 and DC fast charging stations. Through the ongoing partnership with workforce development agencies, safety centers, EV network providers, and EV charging hardware manufacturers, ChargerHelp is able to stand up a local workforce dedicated to operating and maintaining the different software and hardware technologies existing in the market today.

ChargerHelp has touched more than 20,000 data points nationwide and understands the complexity in the development of new models of electric vehicle charging station equipment including MHD charging. The federal government and the Joint Office of Energy and Transportation (JOET) have made reliability a priority in the deployment of federally funded EV charging infrastructure, we agree that reliability should be at the forefront as well. Through our established partnerships, ChargerHelp is able to support organizations and companies in ensuring they meet the 97% uptime requirement set by the federal government.

As written in the FHWA Final Rule, software and hardware issues, among other things, are essential in determining uptime. Hardware failure points represent a large portion of issues that affect the true reliability of the charging infrastructure. We believe that field service data allows charging station owners and operators to identify the root cause and resolve these issues in a much faster manner. Incorporating hardware issues and data into the uptime formula will allow for the states to provide a reliable infrastructure for all its customers. ChargerHelp's proven experience ensures that these reliability standards are met regardless of the diverse equipment existing in the market. ChargerHelp is interested in participating in future solicitations to ensure drivers reliability expectations in California, Oregon, and Washington are met.

Additionally, ChargerHelp supports continued investments in the workforce development of the specialized EV charging maintenance technician role. We believe it is critical that California, along with other states, continue to expand on training opportunities in this emerging industry. SAE International recently developed the industry-backed EVSE Field Service Technician Body of Knowledge and Certification that is able to support the growing need to certify the labor force repairing charging stations. Since 2019, ChargerHelp's co-founders have dedicated themselves to the training of a diverse labor force that includes folks from disadvantaged and underrepresented communities, and also a dedicated focus on providing accessible training for women. ChargerHelp would be thrilled to continue to support this growth and looks forward to seeing such programs derive from the CFI Grant Program.

We appreciate the opportunity to provide recommendations of successful programs and best practices as we see them through our daily work. We believe that through a seamless and streamlined process, California, Oregon, and Washington will provide a reliable charging experience for drivers delivering goods and services to residents. Please feel free to reach me at [samantha@chargerhelp.com](mailto:samantha@chargerhelp.com) with any questions.

Respectfully,

Samantha Ortega

Samantha Ortega  
Government Relations Manager  
ChargerHelp, Inc