DOCKETED	
Docket Number:	22-EVI-04
Project Title:	Electric Vehicle Charging Infrastructure Reliability
TN #:	261058
Document Title:	CalETC Comments - CalETC's Comments on CEC's Updated Utilization Data Reporting Requirements
Description:	N/A
Filer:	System
Organization:	CalETC
Submitter Role:	Public
Submission Date:	1/10/2025 4:50:57 PM
Docketed Date:	1/10/2025

Comment Received From: CalETC
Submitted On: 1/10/2025
Docket Number: 22-EVI-04

CalETC's Comments on CEC's Updated Utilization Data Reporting Requirements

Additional submitted attachment is included below.

CalETC
California Electric Transportation Coalition

January 10, 2025

California Energy Commission
California Department of Transportation
Re: Docket No. 22-EVI-04

Submitted electronically to https://efiling.energy.ca.gov/EComment/EComment.aspx?docketnumber=22-EVI-04

Re: Workshop on Updated EVSE Utilization Data Reporting Requirements

The California Electric Transportation Coalition (CalETC) appreciates the opportunity to provide comments on the updated EVSE utilization data reporting requirements. CalETC would like to thank the CEC for all your hard work on developing the proposed EVSE reliability and reporting regulations, and we support your commitment to meeting California's ZEV goals with reliable charging infrastructure.

CalETC supports and advocates for the transition to a zero-emission transportation future to spur economic growth, fuel diversity and energy independence, contribute to clean air, and combat climate change. CalETC is a non-profit association committed to the successful introduction and large-scale deployment of all forms of electric transportation. Our Board of Directors includes representatives from: Los Angeles Department of Water and Power, Pacific Gas and Electric, Sacramento Municipal Utility District, San Diego Gas and Electric, Southern California Edison, Southern California Public Power Authority, and the Northern California Power Agency. In addition to electric utilities, our membership includes major automakers, manufacturers of zero-emission trucks and buses, electric vehicle charging providers, and other industry leaders supporting transportation electrification.

CalETC supports the CEC's goal to improve the Integrated Energy Policy Report's (IEPR) forecasts, improve grid planning, and direct investments where they are needed most. CalETC appreciates the CEC's candor about needing better data on charger utilization to improve the forecasting in the IEPR. We continue to recommend that the CEC review these regulations every two years to ensure that the requirements are well tailored to the industry, not overly burdensome, and produce useful data streams to improve reliability and charger forecasts.

CalETC recommends ensuring that the utilization data reporting is automated, that the data is kept securely, and does not increase the cost of charging. We must be very mindful of any requirements that may increase the cost of installing or providing charging for site hosts or network providers. Cost continues to be a major barrier for EV adoption, so any cost increases must be highly scrutinized. Additionally, we recommend the CEC ensure that the utilization reporting requirements do not indirectly discourage or inadvertently eliminate the ability for site hosts to install non-networked charging, which continues to be appropriate in many cases.

CalETC also recognizes that session level data is extremely commercially sensitive and by its nature contains the business strategies and intellectual property of charging network providers. Therefore, session level data must be transmitted, stored, and shared in a secure manner to protect this sensitive business information. We recommend that in the next public meeting the CEC share its strategy and process to ensure this data can be kept securely and confidential.

Finally, CalETC recommends the CEC consider a process to aggregate and share utilization data with the utilities to improve grid planning while ensuring the protection of confidential business information. The location, power level, and utilization of chargers are critical data points in the grid planning process. Providing access to aggregated utilization data will help utilities improve forecasting and planning grid upgrades where large numbers of chargers are being used. That said, CalETC appreciates that the CEC added safeguard provisions for confidential data and recommends that all charger-level utilization metrics be deemed confidential to avoid anti-competitiveness concerns. To the extent utilization data can be aggregated, it should be done in a way that ensures confidentiality and cannot be reverse engineered to determine an individual site's characteristics.

Thank you for your consideration of our comments. Please do not hesitate to contact me at kristian@caletc.com should you have any questions.

Kind regards,

Kristian Corby, Deputy Executive Director
California Electric Transportation Coalition