

DOCKETED	
Docket Number:	22-EVI-04
Project Title:	Electric Vehicle Charging Infrastructure Reliability
TN #:	261061
Document Title:	Electric Vehicle Charging Association Comments on the Revised Utilization Data Reporting Requirement
Description:	N/A
Filer:	System
Organization:	Electric Vehicle Charging Association
Submitter Role:	Public
Submission Date:	1/10/2025 5:22:17 PM
Docketed Date:	1/13/2025

*Comment Received From: Electric Vehicle Charging Association
Submitted On: 1/10/2025
Docket Number: 22-EVI-04*

Electric Vehicle Charging Association Comments on the Revised Utilization Data Reporting Requirement

Please find attached the Electric Vehicle Charging Association's comments to the revised utilization data reporting requirements proposed under docket 22-EVI-04. Thank you.

Additional submitted attachment is included below.

January 10, 2025

California Energy Commission
Docket No. 22-EVI-04
715 P Street
Sacramento, California 95814

RE: Docket No. 22-EVI-04 - Comments on the Revised Utilization Data Reporting Requirement Presented at the December 18, 2024 Workshop

Dear Commissioners and Staff,

The Electric Vehicle Charging Association (EVCA) appreciates the opportunity to provide comment on the revised utilization data reporting requirements proposed for the Commission's forthcoming EV charging reliability regulation.

EVCA is a not-for-profit trade organization of over 20 leading companies within the electric vehicle charging ecosystem, established in 2015 to comprehensively represent the entire EV charging value chain for policymakers throughout the West Coast.

As previously expressed, EVCA acknowledges the importance of implementing reliability-focused regulations pursuant to AB 2061 and AB 126, and as participants within California's larger energy ecosystem, we understand the importance of planning for a reliable grid capable of meeting future demand.

EVCA is, however, concerned with the CEC's recent decision to drastically expand the scope of data required for reporting under the proposed reliability regulation and urge the Commission to reconsider whether such highly sensitive session-level data is necessary to understand California's charging reliability and grid management needs.

Many companies within the EV charging industry already engage with California's utilities on a proactive basis when developing new charging sites, and existing meter data and utility grid planning efforts, such as the Electric Power Research Institute's EVs2Scale2030 initiative, seem sufficient to meet the CEC's forecasting needs.¹

Further, as noted by staff during the December 18th workshop, session-level utilization data is considered significantly more sensitive than the aggregated daily averages called

¹ <https://msites.epri.com/evs2scale2030>

for under previous drafts. The unintended release or use of such sensitive data could enable anti-competitive market behavior that threatens the investments EV charging companies have made in California's charging network.

Given these risks, and given compliance may prove to be overly burdensome or resource-intensive for many nascent charging providers, EVCA remains concerned that utilization data reporting requirements will have a chilling effect on infrastructure investment and deployment in California. This is especially so if there aren't adequate safeguards around the retention and use of such data.

In looking to the final draft staff report, EVCA would encourage the Commission to elaborate on its rationale for requiring the disclosure of such sensitive information, including the statutory basis for applying the requirement to publicly and privately funded chargers alike. Additionally, EVCA would urge the Commission to outline how it intends to collect, use, store, and protect such competitively sensitive business information, and to ensure the industry has ample time to review any proposed protocols before compliance begins.

Once again, we thank the Commission for the opportunity to provide comment on the revised proposal and look forward to continuing our engagement as we work to build a larger and more reliable EV charging network.

Sincerely,

Reed Addis

Governmental Affairs

Electric Vehicle Charging Association