

DOCKETED	
Docket Number:	22-EVI-04
Project Title:	Electric Vehicle Charging Infrastructure Reliability
TN #:	261901
Document Title:	Electrify America Comments on Vandalism
Description:	N/A
Filer:	Elisia Hoffman
Organization:	Electrify America
Submitter Role:	Other Interested Person
Submission Date:	2/20/2025 2:57:12 PM
Docketed Date:	2/20/2025



February 20, 2025

California Energy Commission
Fuels and Transportation Division
715 P Street
Sacramento, California 95814

RE: Response to the RFI on Electric Vehicle Charger Vandalism and Cable Theft

Dear Staff:

Electrify America appreciates the opportunity to comment on the California Energy Commission's (CEC) RFI on Electric Vehicle Charger Vandalism and Cable Theft. Electrify America is the nation's largest open network of DC fast chargers (DCFC) for electric vehicles (EVs), with over 5,000 fast chargers across 1,000 locations around North America¹, and over 1,200 chargers across more than 260 locations open to the public in California.

Thank you for the opportunity to provide public comment. We look forward to working with the CEC in its efforts to understand recurring vandalism and theft occurring at EV charging stations.

1. Please describe you or your organization's experience with charger vandalism and cable theft.

a. Is vandalism a chronic issue for you or your organization, or more episodic?

Electrify America has experienced an uptick in EV charger vandalism and cable theft beginning in 2023, with the issue becoming more recurring in 2024. Vandalism has become a chronic issue at certain Electrify America sites and impacts the availability of chargers at those locations.

b. Do you or your organization view vandalism as a minor issue or a more serious issue that is affecting the reliability of your network and your drivers' charging experiences?

Electrify America views vandalism as a very serious issue. In several instances, we have brought impacted stations back online after a vandalism event only for the station to be vandalized again in a matter of weeks, or sometimes days. This severely impacts the charging needs of EV drivers, especially those that do not have access to at-home charging (renters, multi-family residents, etc.) or those that travel far distances.

¹ This includes Electrify America, Electrify Canada and Electrify Commercial.



c. If a chronic issue, is it widely and randomly distributed, or is it focused in particular geographic area(s)? If it occurs in specific geographic area(s), please describe the types of locations and the types of vandalism. Are there common characteristics (location, charger, type, and so forth) among chargers that are more frequently vandalized? Does the vandalism include theft of equipment to sell, such as charger cables and associated copper? Or is vandalism typified by malicious damage?

Vandalism of our EV charging stations is mainly concentrated in larger, metropolitan areas. However, stations in smaller cities have also been impacted. Electrify America welcomes the opportunity to speak directly with CEC Staff regarding specific geographic areas in California that are directly impacted by vandalism and theft.

d. What are the most frequent targets of vandalism? Cables, connectors, power cabinets, or other components?

Cable theft, of both cables within the power cabinet and those that connect to the vehicle, are the most frequent targets by vandals, but other components of our sites are also being impacted, including switchgear² and equipment at pre-commissioned construction sites. It is our understanding from law enforcement that often cables are stolen to sell the copper wire inside.

e. Do you systematically track vandalism incidents as part of your maintenance and operations? If so, do you maintain data on the frequency, distribution, and severity of such incidents? Is your organization willing to share this data with the CEC publicly or privately?

As a result of recurring vandalism, our operations team has had to redirect staff time and resources to this issue, resulting in the creation of an internal loss prevention team. Once a site has been vandalized, our Operations team acts swiftly to return the site back online. Our loss prevention team notifies law enforcement and files a police report. We welcome the opportunity to speak directly with CEC Staff regarding specific trends, distribution and severity of vandalism.

f. What is the average time to repair vandalized chargers?

The time it takes to bring the site back online varies. It can depend on the severity of the damage to the site, and the availability of cables and technicians, oftentimes taking

² which can encompass several power conducting components and control systems to monitor, control and protect components that conduct electricity (e.g., circuit breakers, fuses, control systems etc)



weeks. A rush maintenance order for a vandalized site also results in significant additional cost.

g. On a percentage basis, what portion of your network has been unavailable to drivers due to vandalism over the past 12 months? Please specify your calculation basis, for example, in terms of the number of ports or sites, and specify your definition of “available.” Are there regions of the state where these percentages are greater and the problem more acute?

As indicated in our answer above, we are willing to speak with CEC Staff regarding specific regions of the state most impacted by vandalism.

h. How many charging ports (number rather than percentage) in your network have been unavailable to drivers due to vandalism over the past 12 months? Are there regions of the state where the quantity is greater and the problem more acute?

As indicated in our answers above, we are willing to speak with CEC Staff regarding specific regions of the state most impacted by vandalism.

i. What are the financial impacts to your organization’s network from vandalism? How much does it cost to repair and replace vandalized equipment, such as cables that have been cut and stolen for their copper? Please delineate the costs between AC and DC chargers.

The cost to repair DC cables can cost several thousand dollars, on average, per cut cable. We are willing to speak with CEC Staff, on a confidential basis, regarding the financial impacts on our network from vandalism.

j. Please describe any approaches you have used to mitigate vandalism.

To mitigate and deter theft, our loss prevention team has implemented several security enhancements, including advanced camera monitoring, enhanced lighting and clearing away unnecessary fencing, to make the site more visible to the public.

2. How do you recommend the CEC support the prevention and remediation of EV charger cable theft and vandalism?

Electrify America appreciates the CEC’s efforts to support the prevention and mitigation of EV charger vandalism. We encourage the CEC to understand root cause issues of



vandalism and work with state agencies such as the Department of Toxic Substance³ Control, the Attorney General's office, EV charging providers, law enforcement agencies and other impacted stakeholders.

a. Are there site designs or security measures that you have found to be effective?

Clearing away unnecessary fencing to make the station more visible to the public may be helpful.

b. Are there equipment modifications or re-designs that you have found to be effective? For example, are aluminum conductors a plausible option?

Electrify America would be willing to speak with the CEC about our recommendations regarding equipment modifications. However, we caution against creating any re-design or equipment modifications standards or requirements for industry.

Aluminum conductors may be a plausible option, but in limited applications and mainly for switchgear, depending on conduit size and power delivery.

c. Are there best practices you would recommend?

We look forward to continued engagement with the CEC and industry on identifying best practices.

d. Are there security measures, design considerations, or best practices you would recommend that the CEC could require for publicly funded chargers?

We strongly urge that the CEC does not include any other requirements, including those to mitigate and prevent vandalism, for publicly funded chargers. Doing so would add additional costs to an industry that's already trying to protect its chargers from recurring vandalism.

³ State agency that oversees scrap metal recycling in California: <https://dtsc.ca.gov/scrap-metal-recycling-regulatory-oversight/>



3. Please identify key partners and working groups engaged in addressing and solving charger vandalism and cable theft.

a. Do you or your organization work with local law enforcement? If so, has this proven effective at reducing or eliminating vandalism events?

Yes, we actively work with law enforcement and submit police reports detailing the severity of the crime.

b. Are you aware of any public or private organizations conducting systematic investigations on the frequency, severity, and distribution of EV charger vandalism? If so, please identify any such studies.

Electrify America is not aware of any investigations or studies on the frequency, severity and distribution of EV charger vandalism.

Conclusion

Electrify America appreciates the opportunity to comment on the CEC's RFI and supports the CEC's ongoing work to accelerate the transition to EVs in California. We look forward to working with Staff on prevention and mitigation of recurring vandalism and theft of EV charging.

Sincerely,

/s/

Elisia Hoffman
State Government Affairs Lead
Electrify America, LLC