

DOCKETED

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SemaConnect Comments on CEC EVSE Reliability Docket

Additional submitted attachment is included below.



April 1, 2022

California Energy Commission
715 P Street
Sacramento, CA 95814

Docket: 21-TRAN-03

Project Title: Zero Emission Vehicle Infrastructure Barriers and Opportunities

RE: Electric Vehicle Charging Association (EVCA) Comments on Electric Vehicle Charging Infrastructure Reliability Workshop

Dear Members of the Commission:

SemaConnect appreciates the opportunity to offer comments to the state Energy Commission on reliability considerations for electric vehicle supply equipment (EVSE) and charging infrastructure. We strongly concur with the Commission that rapidly deploying zero emission vehicles (ZEV) including electric vehicles is essential to achieve California's climate change and air quality goals.

We are a leading developer, manufacturer and provider of plug-in, zero-emission vehicle infrastructure including commercial-grade electric vehicle charging systems and comprehensive network services. Our plug-in, networked ZEV infrastructure is deployed in a wide range of applications that include multifamily, workplace, fleet, and public charging across California and nationwide.

Regarding the Commission's request for the best methods to collect data for existing and future EV chargers, SemaConnect would prefer to provide raw data related to charger status following OCPI POI API so that the Commission can calculate reliability uniformly across all electric vehicle chargers regardless of manufacturer or network platform. This also will offer an opportunity to fine-tune the formula through future coordination with industry and other stakeholders.

We also respectfully offer the following list of parameters based on OCPI:

- Online – Available, Charging, Blocked (by a non-electric vehicle, etc.), Reserved.
- Offline – Inoperative, Out of Order, Planned Maintenance, Removed, etc.



With respect to process, SemaConnect would prefer to provide the raw data corresponding to the individual charger:

- eligible for this program; and
- also registered with the SemaConnect platform.

Furthermore, SemaConnect respectfully recommends that the Commission exclude certain items when calculating EV chargers' reliability, such as:

- Scheduled maintenance
- Power failure, etc.

We believe that reaching a lasting consensus on an industry-wide formula for calculating reliability will take time; accordingly, SemaConnect recommends adopting a two-phase approach as described below:

- Collecting raw data and commencing the incentive program.
- In parallel, the Commission can continue its work to develop a formula for calculating reliability while seeking stakeholders' input including from the EVSE industry and other interested parties.

In closing, we appreciate the Commission's commitment to ensuring that EV charging is widely available, affordable, and easily accessible.

Sincerely,

Swapan Das
Director of Product Engineering
SemaConnect, Inc.