

**DOCKETED**

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*Comment Received From: Matthew E Chen  
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**Blink Charging & SemaConnect Comments on CEC Reliability  
Workshop (Oct 21)**

Please find attached comments from Blink Charging Co. and its subsidiary SemaConnect regarding the CEC EV Charging Reliability Workshop held on October 21.

*Additional submitted attachment is included below.*



November 8, 2022

California Energy Commission (CEC)  
715 P Street  
Sacramento, CA 95814

**Re: Electric Vehicle Charging Infrastructure Reliability Workshop on Oct. 21<sup>st</sup>**

Dear CEC Commissioners and Staff:

Blink Charging Co. appreciates the opportunity to comment on the recent [CEC workshop](#) on October 21 about Electric Vehicle Charging Infrastructure Reliability. We warmly welcome the dialogue that the Energy Commission has with the Electric Vehicle Charging Association (EVCA) and our company and appreciate your willingness to hear our views on how the CEC proposes to define an experienced charging network provider in California for the National Electric Vehicle Infrastructure (NEVI) Formula Program. As we have shared with you before, Blink already has more than 10,000 chargers in California alone (with an additional, nearly 3,000 chargers from our recent acquisition of SemaConnect), and we are committed to supporting the state's vital zero-emission vehicle (ZEV) infrastructure goals.

Specifically, we would like to raise a concern regarding one presentation that cited the JD Power & Associates (JDPA) 2021 [survey](#), "Public Charging Experience for Electric Vehicle Owners Can Get Much Better, J.D. Power Finds" (18 August 2021). The survey cited was a paid, commercial activity that does not account for the full range of EV charging industry-specific considerations affecting reliability. These include legacy/first-generation chargers, malfunctioning chargers that site hosts own but decline to repair (which charging companies cannot control), and upgraded chargers provided directly by EV charging companies at their own expense. For example, Blink directly funded the replacement of EV chargers from both 2G and 3G to 4G technology while some EVSPs required customers to choose between paying for this vital upgrade at their own expense or have the charging station turned off.

We believe adopting paid customer satisfaction surveys as an additional, formal performance measure, as proposed by a speaker during the presentation, would be problematic to evaluate EV charging reliability. The reason we hold this perspective is JDPA earns profits from the sales of its surveys. JDPA also has close ties to the automotive industry, including an automotive company that owns a leading EVSP. There are other more robust, peer-reviewed literature that would be more suitable from an analysis perspective -- for example, an academic study from the University of California at Berkeley, "[Reliability of Open Public Electric Vehicle Direct Current](#)



[Fast Chargers](#)” (April 2022), addresses a functionality analysis on public DC fast charger reliability.

Blink is committed to providing Californians with affordable, accessible, and reliable EV charging infrastructure. In October, we launched our entirely rebuilt Blink Network with market-leading architecture and responsiveness and premiered our new mobile app.

- Both innovative software platforms have been built on industry-leading architecture to provide an intuitive, seamless, and convenient charging experience built upon a reliable, flexible, and responsive platform.
- The new, cloud-based Blink Network allows Blink site hosts to onboard and connect Blink chargers globally, offering management of chargers in multiple languages that include English, French Canadian, Greek, Hebrew and Spanish with the capability of adding other languages.
- Site hosts also will have expanded functionality in creating dynamic pricing protocols, responsive to application, locations, and schedule. The robust new host portal gives full visibility and control for site hosts across chargers and locations.

Recently we also announced a collaborative agreement with Hsubject, an open IT platform provider, to offer the Plug & Charge functionality to Blink customers in the United States and Europe and grow the Plug & Charge ecosystem.

In closing, we recognize the importance of having reliable EV charging in California and setting minimum standards as the industry expands at a rapid pace. We also commend the Energy Commission for taking a collaborative approach ahead of its rulemaking to implement the provisions of AB 2061 (2022). As the CEC considers other reliability metrics in addition to uptime, we respectfully recommend that only unbiased, rigorous, and fully transparent methodologies are taken into consideration for this process.

Please do not hesitate to contact me with any questions that you may have. Thank you very much for your time.

Sincerely,

*Matthew E. Chen*

Matthew E. Chen  
Director, Government Affairs  
Blink Charging Company