

DOCKETED

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**Cool the Earth comments on Electric Vehicle Charging
Infrastructure Reliability**

Attached are Cool the Earth comments on CEC's Electric Vehicle Charging
Infrastructure Reliability.

Additional submitted attachment is included below.



Cool the Earth Comments

October 10, 2022

Docket #22-EVI-04

Electric Vehicle Charging Infrastructure Reliability

Cool the Earth (CTE), a nonprofit organization, has worked for over a decade to educate consumers about clean electric driving and lead a national nonprofit collaborative effort, Ride and Drive Clean. Cool the Earth appreciates the opportunity to provide comments on the CEC Pre-Solicitation Joint Workshop.

Cool the Earth has extensive driver-focused experience with public charging including DC Fast (DCFC), working with thousands of members of the public as well as with cities, agencies, NGOs, utilities, and CCAs. Unfortunately, our constituents frequently have encountered numerous reliability issues that prevent successful charging and less than ideal user experiences in terms of safety and comfort.

Cool the Earth commends the CEC for placing a high priority on reliability requirements for EVSE. We strongly support the 97% uptime requirement for at least 5 years. However, this requirement will have no real-world impact without enforcement and third-party verification.

Enforcement and Third-Party Verification

The CEC indicated in the October 31, 2022 workshop it will implement some form of third-party verification, but details were not provided. CTE strongly supports third-party verification. CTE recommends robust third-party verification of many aspects of EVSP performance, most importantly uptime, the key indicator of reliability. Without independent third-party verification of EVSP-reported data, the performance requirements lack authority.

We also urge the final grant contracts and future grant solicitations to include enforceable consequences for noncompliance.

- We strongly suggest that the terms in the "template language" be included in future CEC grant solicitations in addition to grant contracts. This will help ensure CEC authority to enforce these reliability requirements.
- We recommend that 25% of funding should be withheld until reliability requirements have been demonstrated consistently for the length of the grant period.
- We urge CEC to consider imposing penalties on grantees who do not meet the terms of the grant solicitation or grant contract.

CEC's Reliability Agreement Language Template for REACH and REV

In general, the template conditions are good. We believe these terms should be mandatory and adopted for all CEC grants through REACH and REV.

- The Recordkeeping task requires operational status to be recorded by connector, but the required Stations Operations Report is prepared for each site. This appears to be in conflict. CTE strongly supports recordkeeping and reporting by connector. CTE recommends that the description of the content of the Stations Operations Report be expanded and clarified to ensure all relevant metrics are provided, including uptime by connector.
- The template requires regular preventative maintenance but does not specify a required funding level to ensure adequate maintenance. We recommend that the CEC include a specific contractual approach to ensure adequate funding for maintenance. For instance, contracts could require a maintenance escrow account that accumulates money and is drawn upon based on the actual expenses.
- The Maintenance task requires “regular preventive maintenance, including visual inspection, performance testing, functional validation, and reporting.” No description of the requirements for performance testing or functional validation are included. This could result in widely different and inadequate approaches to performance testing and functional validation. CTE recommends that the CEC include minimum requirements and protocols for performance testing and functional validation.
- CTE supports the requirement for a quarterly Stations Operations Report to CEC. We suggest that a summary of these reports be publicly available. Californians have a right to know if public funds for EVSE are achieving reliable EV charging.
- CTE urges the CEC to limit excluded time for vandalism to no more than 5 days.

Workshop Presentation

- CTE is very supportive of the proposed Consumer Survey requirement that chargers bear a sticker/sign/QR code with unique identifier and survey link for EV drivers to report down chargers and cause of outage.
- CEC staff indicated that 3rd party verification will be implemented, and CTE strongly supports this. Independent field testing after initial installation and startup, and then at some regular interval is critical to establishing reliability. Field testing frequency should be higher for chargers with a history of high levels of downtime.

Thank you for your consideration of these comments.

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