

DOCKETED

Docket Number:	22-EVI-04
Project Title:	Electric Vehicle Charging Infrastructure Reliability
TN #:	252761
Document Title:	SWTCH Energy, Inc Comments - on Draft Staff Report
Description:	N/A
Filer:	System
Organization:	SWTCH Energy, Inc.
Submitter Role:	Public
Submission Date:	10/25/2023 2:48:52 PM
Docketed Date:	10/25/2023

*Comment Received From: SWTCH Energy, Inc.
Submitted On: 10/25/2023
Docket Number: 22-EVI-04*

SWTCH Comments on Draft Staff Report

Please find attached SWTCH's comments on the Draft Staff Report in Docket # 22-EVI-04.

Additional submitted attachment is included below.

October 25, 2023

Mr. Dustin Schell
Air Resources Engineer
California Energy Commission
715 P Street
Sacramento, CA 95814

Re: Docket No. 22-EVI-04 - Comments on Draft Staff Report Tracking California's Electric Vehicle Chargers

Dear Mr. Schell:

SWTCH respectfully submits these comments on the Draft Staff Report issued September 26th, 2023 in the above-named docket. SWTCH supports California's efforts to improve reliability across its EV charging ecosystem. We offer support for specific program elements and suggestions for modifications that will enable more streamlined implementation of these proposed regulations.

About SWTCH

SWTCH is a leading provider of electric vehicle (EV) charging and energy management solutions for multifamily, commercial, and workplace properties across North America. Our end-to-end solution optimizes EV charging usage and manages load to benefit drivers, property owners, and the grid. SWTCH has deployed more than 7,500 chargers across North America, with a strong focus on equitable access. SWTCH's charging management platform is built upon a foundation of open communication standards and interoperability to prevent stranded assets and to ensure future flexibility, scalability, and innovation.

Comments

- 1. SWTCH supports a baseline assessment of charging stations.** SWTCH understands that the CEC faces limited data on existing charging stations, making planning and program development more difficult. We support reporting of basic characteristics of charging stations, including location and nameplate details. The CEC should standardize implementation in such a way that this process will not be burdensome for site hosts and EV charging station operators.
- 2. There is no clear or compelling need for utilization data collection at this time.** While there may be use cases for which the proposed utilization data could inform analyses, in SWTCH's view such use cases are not fully developed in the draft report in a way that would warrant or necessitate utilization data. Data is not in and of itself useful, and the CEC should avoid implementing a significant reporting burden without clearly articulated questions for the data to inform. In the absence of a more targeted end-use, the proposed utilization data collection regulation will create an unnecessary and significant burden for reporting agents and the CEC. It will result in reporting agents pushing a huge volume of data to the CEC, but will not result in a clear outcome for California's EV drivers, station operators, and

program planners. We urge the CEC to avoid setting utilization data reporting requirements at this time.

As an alternative to establishing utilization data reporting requirements, the CEC may wish to convene a working group to outline a set of questions the CEC would need to answer in its role as forecaster of EV needs, and to consider and weigh the merits of discrete data points required to answer these very specific questions.

3. **SWTCH supports the use of Open Charge Point Protocol (OCPP) and a phased-in API interface for program implementation.** Leveraging OCPP functionalities for uptime reporting purposes is an effective way to reduce administrative overhead for reporting agents. SWTCH further believes the timeline of January 1, 2026 laid out for use of API-based reporting by enrolled charging networks is reasonable. The transition to API-based reporting will take time to build out for this specific use case, so an option for an interim reporting mechanism – such as a CSV dataset upload – will likely be needed. SWTCH further encourages the CEC to consider a mechanism for pulling data from APIs built for CEC-reporting purposes as opposed to requiring reporting agents to regularly push data to the CEC. This will reduce reporting burden and potential delays.
4. **CEC uptime requirements should generally align with the National Electric Vehicle Infrastructure (NEVI) program standards, but should also consider further stakeholder feedback, and be flexible enough to avoid imposing a uniform uptime standard for all use cases.** SWTCH supports CEC's attention to uptime and the reliability of California's charging network. As the CEC noted at the October 9th workshop covering these issues, the agency is legislatively required to set minimum uptime requirements for certain chargers. SWTCH strongly encourages the CEC to align its uptime requirements with NEVI standards, to avoid imposing two disparate reporting and monitoring regimes onto reporting agents.

Although SWTCH supports standardizing uptime requirements to align with NEVI standards, SWTCH also believes elements of uptime tracking, reporting, and implementation will require continued iteration as the industry matures. Given the level of detail required to implement minimum uptime standards, we do not believe the CEC has received the level of stakeholder input needed to set such requirements at this time. Rather than include minimum uptime standards in its final report, the CEC should convene a separate process to receive stakeholder input on a draft regulation specific to minimum uptime requirements.

Moreover, SWTCH notes that factors that affect a charger's uptime are very different depending on the use case. As an example, factors that affect uptime for an installation of public fast chargers owned and operated by a single charging network provider are not the same as those affecting uptime for private-access chargers in an apartment or condominium building. Accordingly, from a regulatory standpoint, NEVI's 97% uptime requirement for publicly accessible chargers is not necessarily the right fit for privately accessible chargers. To the extent the CEC does move forward with a minimum uptime standard, SWTCH strongly encourages the CEC to avoid a one-size-fits-all approach and instead allow for flexible application of uptime standards depending on the use case and the accessibility of the chargers.

SWTCH comments to the CEC on Docket No. 22-EVI-04

October 25, 2023

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In Closing

SWTCH appreciates the steps that the CEC is taking to improve EV infrastructure and the charging experience across the state. We look forward to working with stakeholders to advance best-in-class EV charging infrastructure deployment and operational practices, and appreciate the opportunity to comment on these matters. If you have questions or if I can provide more information, please contact me at josh.cohen@swtchenergy.com or 202.998.7758.

Respectfully,

A handwritten signature in blue ink, appearing to read "Josh Cohen", with a long horizontal stroke extending to the right.

Josh Cohen
Head of Policy