

<b>DOCKETED</b>	
<b>Docket Number:</b>	22-EVI-04
<b>Project Title:</b>	Electric Vehicle Charging Infrastructure Reliability
<b>TN #:</b>	252768
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*Comment Received From: California Trucking Association  
Submitted On: 10/25/2023  
Docket Number: 22-EVI-04*

**DOCKET 22-EVI-04 CHARGER RELIABILITY**

Please see attached

*Additional submitted attachment is included below.*

October 25, 2023

California Energy Commission  
715 P St.  
Sacramento, CA 95814



### **Comments on Docket: 22-EVI-04**

Thank you to the California Energy Commission (CEC) for the opportunity to comment on the Draft Staff Report: Tracking California's Electric Vehicle Chargers.

The uptime and reliability issues of charging providers in the light duty passenger car space has been well documented<sup>1</sup>. The California Trucking Association (CTA) fully supports the CEC enacting standards for third party providers of charging networks to ensure reliability and uptime.

However, as zero-emission medium and heavy duty vehicles and charging technologies are still nascent, we are concerned that the proposed regulations will create additional, unnecessary administrative burdens for fleets attempting to deploy such vehicles and charging.

Medium and heavy-duty truck fleets have challenges and considerations distinct from the typical passenger vehicle operator. For example, trucking fleets are:

- More likely to install numerous chargers in a depot
- More likely to value EVSE uptime and reliability to ensure fleet vehicles will be charged
- More likely to be the utility's customer of record
- More likely to deploy demand management software
- More sensitive to cybersecurity, trade secrets and data privacy and protection

We are concerned that the definition of "charging network provider" could inadvertently subject fleets to the requirements of this regulation. For instance, if a fleet deploys demand management software to manage its depot chargers to avoid time of use and demand charges or otherwise manage its fleet charging, the fleet would likely fall under the definition of "charging network provider".

**We recommend CEC consider exempting commercial trucking fleets from any requirements under the regulation related to uptime and utilization.**

As noted above, trucking fleets are sufficiently incentivized to maintain chargers they operate for the benefit of their own fleets. Delays in maintenance will be outside the control of the fleet as they await EVSE vendor service or experience parts delays due to supply chain issues.

Utilization information would likely be considered proprietary trade secrets related to the operation of private businesses. Unlike third party charging providers, there is absolutely no incentive for truck fleets to procure EVSEs which they do not intend to use for their own fleet vehicles.

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<sup>1</sup> <https://www.jdpower.com/business/resources/ev-leasing-volumes-poised-surge-tax-rule-makes-it-cheaper-lease-buy>

Thank you for the opportunity to submit these comments. If you have any questions, feel free to reach out.

Sincerely,

A handwritten signature in black ink, appearing to be 'CS', with several overlapping loops and a long horizontal stroke extending to the right.

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