DOCKETED	
Docket Number:	23-EVI-01
Project Title:	Electric Vehicle Charger Reliability and Accessibility Accelerator (EVC RAA) Program
TN #:	255718
Document Title:	Electric Era Technologies, Inc. Comments - Electric Era Comments re Proposed EVC RAA Program
Description:	N/A
Filer:	System
Organization:	Electric Era Technologies, Inc.
Submitter Role:	Applicant
Submission Date:	4/15/2024 5:01:04 PM
Docketed Date:	4/16/2024

Comment Received From: Electric Era Technologies, Inc.
Submitted On: 4/15/2024
Docket Number: 23-EVI-01

Electric Era Comments re Proposed EVC RAA Program

Additional submitted attachment is included below.

Docket Number: 23-EVI-01

April 15, 2024

Electric Era Technologies, Inc.
3257 17th Ave W, Suite 101
Seattle, WA 98119

Dear CEC,

Thank you for the opportunity to provide comments on the proposed structure of the CEC's Electric Vehicle Charger Reliability and Accessibility Accelerator (EVC RAA) Program, which will distribute $63.7 million in FHWA funding to repair or replace non-operational EV chargers throughout the State.

Introduction

Electric Era provides intelligent battery-backed DCFC systems that are specifically designed to address the industry's persistent reliability issues and to minimize impact on our overburdened grid. Our patented, fully-integrated charging system – called PowerNode – combines power from the grid with power from our battery energy storage system (BESS) to provide charging power beyond the grid's limit. PowerNode, among other things, also provides demand management, reduces operating costs (including by minimizing demand charges), and remotely detects and recovers from station errors or faults.

Electric Era sells PowerNode charging stations to a variety of public- and private-sector customers, including agencies, larger enterprise customers, smaller mom-and-pop stores, and companies that own/operate networks of EV charging stations.

Suggestions for EVC RAA

The EVC RAA funding presents a unique opportunity for California to make a dent on the hundreds of non-operational EV chargers that have frustrated drivers across the Golden State and to help convince more drivers to shift away from ICE vehicles.

While we appreciate the CEC's desire to disburse the EVC RAA funding expeditiously, we are concerned that the proposed program structure would simply provide "free" money to the same half-dozen companies that are responsible for not properly maintaining and supporting their chargers in the first place, without providing opportunities for newer or different providers to participate.

Specifically, the proposed program structure would make a project ineligible if the charger is under warranty or if a project results in alterations to an existing service-level agreement. While we understand the intent of these prohibitions, the reality is that a charger under warranty or under an SLA does necessarily mean that the necessary repairs/replacement will be done for free (or at all). In fact, many CPOs charge for repairs or replacements under their warranty or SLA, which is one of the reasons why so many are non-operational today.

Instead, we encourage the CEC and Caltrans to structure the EVC RAA program so that it is company-/CPO-agnostic: the funding should allow the replacement of non-operational chargers with eligible charging stations from other providers (if the charging-station owner so desires), regardless of whether the charger is under warranty or under a service-level agreement (SLA).

First, we do not believe that the CEC should be have to be in the business of – or responsible for – enforcing private contractual relationships for the half-dozen CPOs responsible for the 3,500 broken ports in California. Second, if the CEC's goal is to ensure that EVC RAA funding is not used to cover the cost of something that could be done for less or free (due to the charger being under warranty or SLA), the CEC could instead require copies of existing warranties/SLAs or require documentation/calculation of the cost of repairs/replacements under any existing warranties/SLAs.

Conclusion

As the CEC finalizes the program structure for the EVC RAA funding, we ask that the program be company-agnostic and avoid requirements that would all but direct the $63.7 million to the exact same CPOs that are ultimately responsible for their non-operational chargers.

Thank you again for the opportunity to provide comments. Please do not hesitate to reach out should you have any questions or if we could be of further assistance.

Sincerely,

Brian Kyuhoon No
Head of Government Affairs
Electric Era Technologies, Inc.