

DOCKETED	
Docket Number:	22-EVI-04
Project Title:	Electric Vehicle Charging Infrastructure Reliability
TN #:	256381
Document Title:	Members of the California State Assembly Comments - Support for the Second Draft Staff Report Tracking & Improving Reliability of California's EV Chargers
Description:	N/A
Filer:	System
Organization:	Members of the California State Assembly
Submitter Role:	Public
Submission Date:	5/14/2024 5:01:48 PM
Docketed Date:	5/15/2024

*Comment Received From: Members of the California State Assembly
Submitted On: 5/14/2024
Docket Number: 22-EVI-04*

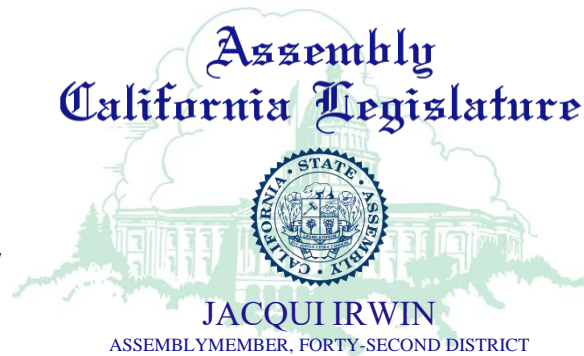
Support for the Second Draft Staff Report Tracking & Improving Reliability of California's EV Chargers

Additional submitted attachment is included below.

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Patty Monahan, Commissioner
California Energy Commission
715 P Street
Sacramento, CA 95814

Dear Commissioner Monahan,

We write to express our strong support for the draft regulations in California Energy Commission’s recently-released Second Draft Staff Report: Tracking and Improving Reliability of California’s Electric Vehicle Chargersⁱ that would implement inventorying, uptime, and data reporting standards. These draft regulations provide a comprehensive look at the necessary steps to address looming challenges in the EV charging experience.

The proposal is promising as California continues to build infrastructure to meet our 2035 target of over 1 million electric vehicle chargers. We are heartened to see the CEC’s three-pronged approach towards a more reliable and transparent charging experience and would urge the CEC to continue holding the EV charging industry to the highest standards.

The proposed uptime and inventorying requirements will provide industry, legislators, and regulatory staff with a clearer picture of the infrastructure needed to meet the goal of 1.01 million chargers installed by 2035. Uptime standards as required pursuant to AB 126 (Statutes of 2023) and AB 2061 (Statutes of 2022) will put to use the reported data, increasing consumer confidence for our constituents that charge outside the home. Further, providing real-time data on a “per port” rather than per charger basis, will assist the CEC and industry in identifying specific failure points, and help to improve driver confidence in the accuracy of the data reported by the charger that they choose. These two targeted approaches to collecting and reporting uptime data give better information to regulators and industry about specific charger failure points, which will ultimately aid in increasing uptime and charger reliability. Lastly, we would like to applaud the CEC on its addition of the successful charge attempt rate (SCAR) standard to the draft regulations. The SCAR standard complements the 97 percent uptime standard, and may reflect an even stronger consumer protection standard moving forward.

Although the alternative proposals outlined in the draft regulations do drive conversation with industry in the right direction, we believe more needs to be done in order to achieve our climate

goals. Therefore, we would like to state our full support for the original proposal containing recordkeeping and reporting requirements, reliability and performance standards including 97 percent uptime and 90 percent SCAR standards, and real-time availability and accessibility data for publicly available chargers. Additionally, we request the CEC to consider increasing the minimum length of time used to measure a successful charge attempt. Five minutes may not accurately depict a successful charging attempt, since drivers can find themselves disconnected without having received the level of charge they need.

We appreciate your consideration of this letter and look forward to partnering with the CEC to ensure driver satisfaction continues to be at the forefront of the California’s ZEV goals.

Sincerely,



JACQUI IRWIN
Assemblymember, 42nd District



PILAR SCHIAVO
Assemblymember, 40th District



JIM WOOD
Assemblymember, 2nd District



REBECCA BAUER-KAHAN
Assemblymember, 16th District



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PHIL TING
Assemblymember, 19th District

ⁱ Schell, Dustin, Michael Dioha, and Ralph Lee. “Tracking and Improving Reliability of California’s Electric Vehicle Chargers: Regulations for Improved Electric Vehicle Charger Recordkeeping and Reporting, Reliability, and Data Sharing.” California Energy Commission, April 9, 2024.
<https://www.energy.ca.gov/publications/2023/tracking-and-improving-reliability-californias-electric-vehicle-chargers>.