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**ChargerHelp Comments on CEC Second Draft Reliability
Regulations CA EV Charging stations**

Additional submitted attachment is included below.



ChargerHelp, Inc

May 15, 2024

Mr Dustin Schell
California Energy Commission
Fuels and Transportation Division
715 P Street
Sacramento, California 95814

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

Dear Mr. Schell,

ChargerHelp appreciates the opportunity to submit comments on the Second Draft Staff Report and proposed regulations related to EV charger reliability within the above-named docket. We commend the Energy Commission for continuing to work with stakeholders to develop the reliability standards for the EV charging infrastructure in California.

ChargerHelp is a technology company committed to ensuring electric vehicle (EV) charging station reliability. Our technology and boots-on-the-ground programs enable the on-demand inspection, diagnostics, maintenance, and repair of EV charging stations, including both software and hardware. We are a women and minority-owned company that helps solve the industry-wide problem of downed and broken Level 2 and DC fast charging stations. ChargerHelp oversees 20,000 EV charging stations throughout the US. Through the ongoing partnership with workforce development agencies, safety centers, EV network providers, and EV charging hardware manufacturers, ChargerHelp is able to stand up a local workforce dedicated to operating and maintaining the different software and hardware technologies existing in the market today.

ChargerHelp supports the general scope of regulations proposed within the report, and believes they are critical for ensuring electric vehicle charging stations meet the standards and expectations of California drivers. ChargerHelp supports the updated definition of Operational/Up and Uptime to include both hardware and software. Many hardware issues do not trigger errors through OCPP monitoring alone i.e. broken screens, broken credit card readers, damaged connector pins, and other hardware malfunctions. Therefore, we strongly encourage the Commission to develop a framework to capture hardware issues for all

networked chargers. As it currently stands in the report, only non-networked chargers require hardware tracking and reporting. Not incorporating this data into the uptime reporting framework represents a missed opportunity to fully address methods of supporting communities with high down and broken charger rates.

The report includes an explanation of known failure points that affect the driver's ability to initiate a charge, issues that are not currently captured through the network. As previously recommended, field testing should be maximized as a method of capturing, identifying, and reporting those issues that do not occur automatically through the network. To validate this information, we recommend a minimum quarterly operability testing and reporting of the physical equipment.

ChargerHelp strongly supports EV charger reliability standards, and believes the second draft CEC regulations are a step in the right direction. However, we believe that, as-written, they do not fully capture the realities drivers face at charging stations. The addition of SCAR is a good starting point to capturing a successful charge but unfortunately, there are many more issues that are not captured up to that point. We strongly recommend that the Commission take into consideration the EV charging station issues mentioned under Section "EV Charger Failure Points" as a reason to ensure the Commission develops a framework around capturing hardware and payment issues into the uptime/reliability reporting and collecting information that will help identify the communities that are impacted by down chargers.

We appreciate the continued engagement among stakeholders and commitment to ensuring we provide Californians with a seamless charging experience as they transition to electrifying their vehicles.. Please feel free to reach me at samantha@chargerhelp.com with any questions.

Respectfully,

Samantha Ortega

Samantha Ortega
Government Relations Manager
ChargerHelp, Inc