July 22, 2021

Ms. Patricia Monahan
Commissioner, Energy Commission
1516 Ninth Street
Sacramento, CA 95814
Docket: 20-TRAN-02

Re: Understanding reliability is an important equity consideration in the Commission's SB 1000 analysis

Dear Commissioner Monahan,

Thank you for the opportunity to comment on the Energy Commission's (CEC) SB 1000 analysis (analysis), as we recognize it as a critical tool to set the direction of CEC activities in further scaling up the zero-emission vehicle (ZEV) infrastructure market and ensuring equitable access to charging stations.

We strongly believe now that California has established an initial foundation of charging stations across the state, it's critical to ensure high reliability of those stations. Increasing consumer confidence in EVs as accessible and convenient greatly depends on the convenience and reliability of accessing charging stations. Bad charging experiences due to a charger being offline can greatly undermine the state's ZEV market adoption goals.

There is a common perception among drivers and in the industry that many public chargers are poorly maintained or broken entirely, sometimes for months at a time. Broken chargers do not serve drivers well, and create a perception of EVs being unreliable, to the frustration of consumers.

In recognition of this, California's Zero-Emission Vehicle Market Development Strategy (Strategy) calls out reliability of charging stations as a primary responsibility of the CEC[1]. It also suggests tracking "charging system resilience" as a key metric to evaluate the success of ZEV infrastructure scale-up[2]. Going further, the Commission's "action plan" to implement the

[1] Governor's Office of Business & Economic Development. *California Zero-Emission Vehicle Market Development Strategy*. Pages 51, 78, and 79. February 2021.
[2] Governor's Office of Business & Economic Development. *California Zero-Emission Vehicle Market Development*

Strategy once again states that it will collaborate with stakeholders to track and measure EV charging reliability.

As the CEC begins conducting its next iteration of data modeling for charging stations, we encourage staff to monitor if there are disparities in reliability based on the demographics outlined in its initial report, as it could help inform the equitable accessibility of charging stations beyond just their geographic distribution. If the CEC lacks this data, we encourage the agency to consider instituting uptime reporting requirements in its funding programs, as well as coordinate with the Public Utilities Commission to institute this reporting requirement in investor-owned utility programs as well.

Together, this data would be a powerful tool to inform the quality of the state's infrastructure from EV drivers' perspective and help ensure drivers have a consistent and high-quality charging experience across networks and regions of the state.

Thank you for your consideration,

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