

## **Comment 1 for Informational Update on the Electric Vehicle Supply Equipment Standards Technology Review (evseupdate) - Non-Reg.**

First Name: John

Last Name: Ellingwood

Email Address: jtellingwood@att.net

Affiliation: Private Consumer

Subject: Smog a Hybrid

Comment:

Why do you require Hybrids to have smog inspections?  
Over-regulation of tax paying citizens  
will weaken your credibility

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-03-18 17:41:28

No Duplicates.

## **Comment 2 for Informational Update on the Electric Vehicle Supply Equipment Standards Technology Review (evseupdate) - Non-Reg.**

First Name: Tom

Last Name: Kunhardt

Email Address: tt101@mac.com

Affiliation:

Subject: Clean air

Comment:

Please enact policy that leads to lower emissions and clean air!

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-03-30 21:43:15

No Duplicates.

### **Comment 3 for Informational Update on the Electric Vehicle Supply Equipment Standards Technology Review (evseupdate) - Non-Reg.**

First Name: Matthew

Last Name: Chen

Email Address: matthew.chen@semaconnect.com

Affiliation: SemaConnect

Subject: SemaConnect Comments for Public Meeting on EVSE Standards Technology Review  
Comment:

Please see the attached comments respectfully submitted by SemaConnect ahead of the Air Resources Board's public meeting to discuss the February 2022 EVSE Standards Technology Review.

Sincerely,

Matthew E. Chen

Director, Government Policy &

Programs

SemaConnect

Attachment: 'www.arb.ca.gov/lists/com-attach/4-evseupdate-UjECZQR3VWQGxwRh.pdf'

Original File Name: CARB EVSE 2022 Board Meeting - SemaConnect.pdf

Date and Time Comment Was Submitted: 2022-04-05 12:42:05

No Duplicates.

## **Comment 4 for Informational Update on the Electric Vehicle Supply Equipment Standards Technology Review (evseupdate) - Non-Reg.**

First Name: John

Last Name: Ellingwood

Email Address: jtellingwood@att.net

Affiliation:

Subject: Clean Air

Comment:

Why do we mandate having consumers smog their Hybrid vehicles???

Over regulation loses faith in all the good you are doing!!

Also, Making california consumers purchase OEM Cat/Converters for thousands of dollars when you can buy an aftermarket one for hundreds is also losing faith in what you do.

Please have honest - Common sense- regulations

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-04-15 17:52:14

No Duplicates.

## **Comment 5 for Informational Update on the Electric Vehicle Supply Equipment Standards Technology Review (evseupdate) - Non-Reg.**

First Name: Anthony

Last Name: Trujillo

Email Address: ate2001@sbcglobal.net

Affiliation:

Subject: CARB lies about EV efficiency.

Comment:

CARB in ARB/MSD/7-6-94 claims that the battery efficiency is 80%.  
This is a lie! When charged at a charging station for one hour it  
would be

$(80 \times 100) / ((20 \times 8 \times 8) + 80) = 5.88\%$

While during discharge it depends on how many stops the motor  
makes. Every time it starts it's efficiency is almost  
ZERO!!

1 The leakage inductance cannot limit the starting  
current because of the low frequency, which is also detrimental for  
the battery because the current is so high!

2 The magnetizing branch of the motor shunts the  
load current because of the low starting frequency. This also  
increases the battery current supplied while starting.

3 The voltage drop across the inverter  
semiconductors is comparable to the motor's because of the low  
starting frequency.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-04-16 19:06:30

No Duplicates.

**Comment 6 for Informational Update on the Electric Vehicle Supply Equipment Standards Technology Review (evseupdate) - Non-Reg.**

First Name: Chris

Last Name: King

Email Address: chris\_king@siemens.com

Affiliation: Siemens

Subject: Comments on EVSE Standard

Comment:

Attachment: 'www.arb.ca.gov/lists/com-attach/8-evseupdate-AnFVOlw4U21XNAVr.pdf'

Original File Name: Siemens 220418 CARB Comments on EVSE.pdf

Date and Time Comment Was Submitted: 2022-04-18 08:58:18

No Duplicates.

**Comment 7 for Informational Update on the Electric Vehicle Supply Equipment Standards Technology Review (evseupdate) - Non-Reg.**

First Name: Frank

Last Name: Salinger

Email Address: lawyer@franksalinger.com

Affiliation: Joint Trade Association Comments

Subject: Joint Trade Association Comments

Comment:

Attached are comments filed on behalf of the California Bankers Association, the Card Coalition, and the Electronic Transactions Association relating to Electric Vehicle Supply Equipment Minimum Payment Standards. Thank you for the opportunity to comment.

Attachment: 'www.arb.ca.gov/lists/com-attach/9-evseupdate-BWZQNFY2UmIHYlIx.pdf'

Original File Name: CBACCCarb41822final.pdf

Date and Time Comment Was Submitted: 2022-04-18 18:54:02

No Duplicates.

## Comment 1 for Informational Update on the Electric Vehicle Supply Equipment Standards Technology Review (evseupdate). (At Hearing)

First Name: Susannah

Last Name: Saunders

Email Address: s9saunders@gmail.com

Affiliation: Indivisible Ross Valley

Subject: Attention CARB Board of Directors

Comment:

dir="ltr" style="line-height: 1.38; margin-top: 0pt; margin-bottom: 0pt;"><span style="font-size: 11pt; font-family: Arial; font-variant-numeric: normal; font-variant-east-asian: normal; vertical-align: baseline; white-space: pre-wrap;">I cannot emphasize enough the frustration EV drivers experience with non Tesla DC fast charging, especially lower income who drive earlier models that can only afford models whose batteries only have a low range of miles. Recently while charging I chatted with a driver who owned one of the first Leafs who told me he doesn't have the miles to experience a non-functioning charger and has spent hours on the phone with the company to get the charge to initiate. "I don't regret driving an EV, but the chargers are a nightmare."

dir="ltr" style="line-height: 1.38; margin-top: 0pt; margin-bottom: 0pt;"><span style="font-size: 11pt; font-family: Arial; font-variant-numeric: normal; font-variant-east-asian: normal; vertical-align: baseline; white-space: pre-wrap;">Recently, I tried to help an older couple get a charge initiated for their brand new Ford Mach E. We were outside a Walmart in Santa Rosa baking in the sun. The husband had tried repeatedly to get the charger to start. He tried his app, he tried a credit card, and he tried plugging in again and again to get the machine to give him the miles he needed to get home after a trip to the wine country. He asked his wife to help and then grew frustrated and began to yell at her. I tried letting them use my app, but nothing worked.

dir="ltr" style="line-height: 1.38; margin-top: 0pt; margin-bottom: 0pt;"><span style="font-size: 11pt; font-family: Arial; font-variant-numeric: normal; font-variant-east-asian: normal; vertical-align: baseline; white-space: pre-wrap;">Here was a couple trying to do the right thing by driving a car with zero emissions to fight climate change and air pollution. People doing the right thing shouldn't have to suffer because our DCFC rollout causes doesn't function. I have yet to meet an EV driver who isn't angry and 20% go back to gas cars because of this.

dir="ltr" style="line-height: 1.38; margin-top: 0pt; margin-bottom: 0pt;"><span style="font-size: 11pt; font-family: Arial; font-variant-numeric: normal; font-variant-east-asian: normal; vertical-align: baseline; white-space: pre-wrap;">We have to have enforceable standards for any EVSE getting public and



federal dollars. This means a mandatory escrow account with funds devoted to maintenance so the companies can't ignore this critical component; mandatory reporting of data with a 97% uptime requirement. The Air Resource Board and the California Energy Commission need to commit to funding a unit charged with holding companies accountable.</span></p>

<p><span style="font-size: 11pt; font-family: Arial; font-variant-numeric: normal; font-variant-east-asian: normal; vertical-align: baseline; white-space: pre-wrap;">I recently drove to Santa Cruz and saw on my plug share app a fast charger I needed to get enough miles to reach my destination. The winding hills took me by surprise and quickly depleted my miles. When I got to the fast charger both wouldn't start with either of my two credit cards or my app. I was down to thirty miles and that is a horrible feeling I have experienced several times because of broken or malfunctioning chargers. Luckily I could drive to another location with a charger that worked.</span></p>

<p><span style="font-size: 11pt; font-family: Arial; font-variant-numeric: normal; font-variant-east-asian: normal; vertical-align: baseline; white-space: pre-wrap;">We cannot go on like this and cannot expect an equitable transition to zero emission vehicles if this isn't immediately fixed. Residents living in apartments or other Multi Unit Dwelling have no other option and depend on fast charging to work. Asking them to suffer from a dysfunctional system while homeowners have the luxury of charging at home isn't just or fair. Companies need to fix their existing system before they receive any additional funding and then the funding provided must mandate a worry free infrastructure. Anything less is a recipe for a return to gas cars and allowing climate change and air pollution to destroy our state. This can be done and I fully expect it will be.</span></p>

<p><span style="font-size: 11pt; font-family: Arial; font-variant-numeric: normal; font-variant-east-asian: normal; vertical-align: baseline; white-space: pre-wrap;">Respectfully,</span></p>

<p><span style="font-size: 11pt; font-family: Arial; font-variant-numeric: normal; font-variant-east-asian: normal; vertical-align: baseline; white-space: pre-wrap;">Susannah Saunders</span></p>

<p><span style="font-size: 11pt; font-family: Arial; font-variant-numeric: normal; font-variant-east-asian: normal; vertical-align: baseline; white-space: pre-wrap;">Founder of Indivisible Ross Valley</span></p>

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2022-04-28 09:10:09

No Duplicates.

## **Comment 2 for Informational Update on the Electric Vehicle Supply Equipment Standards Technology Review (evseupdate). (At Hearing)**

First Name: David

Last Name: Moller, P.E.

Email Address: david@mollers.us

Affiliation: Marin/Sonoma EV Squad

Subject: Electric Vehicle Supply Equipment Standards Technology Review

Comment:

<p class="MsoNormal">This is to request that CARB to take action to improve and assure the reliability of the open access public DC fast charging system for EVs here in California.<span style="mso-spacerun: yes;">&nbsp; </span>It&rsquo;s clear that a reliable charging system is achievable, as demonstrated by Tesla, but comparability reliability has not been achieved by other charging service providers.<span style="mso-spacerun: yes;">&nbsp; </span>It&rsquo;s critical to get this right in support of accelerating the adoption of EVs.<span style="mso-spacerun: yes;">&nbsp; </span>CARB is in a unique position to make this happen by adding to contracts for public funding of EV charging infrastructure enforceable conditions for uptime and reliability as well as penalties for noncompliance. <span style="mso-spacerun: yes;">&nbsp; </span>CARB may also be able to take action to improve the reliability of existing charging stations. <span style="mso-spacerun: yes;">&nbsp; </span>It&rsquo;s clear that the private sector is not going to solve this problem quickly on its own absent strong and compelling government action. Please take that action now!</p>

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2022-04-28 09:19:14

No Duplicates.

### **Comment 3 for Informational Update on the Electric Vehicle Supply Equipment Standards Technology Review (evseupdate). (At Hearing)**

First Name: Elena

Last Name: Engel

Email Address: elenajengel@gmail.com

Affiliation: 350 Bay Area

Subject: EVSE Reliability

Comment:

<p>On a recent trip to the Central Coast from the Bay Area with my Chevy BOLT, my experience with the DC Fast Chargers was really bad.&nbsp; Let's be clear:&nbsp; I had to charge my car to make it to my destination.&nbsp; In total on the round trip, I attempted to use 7 different plugs at EV stations along my route.&nbsp; My first charge, in Salinas was fine.&nbsp; It charged my car as requested.&nbsp; The next 6 experiences were awful.&nbsp; I had to call the customer service number to get help.&nbsp; Sometimes they were unable to start the station or reboot it and they just told me to move to another plug!&nbsp; Other times it took about 1/2 hour to&nbsp; get the charger to work.&nbsp; I would not call that 'fast charging'.&nbsp; In total 1 of 7 stations worked properly, without intervention of customer service.&nbsp; That is 14% .&nbsp; Any teacher will tell you that a grade of 14% is far below failing.&nbsp;&nbsp;</p>

<p>Chargers have to work smoothly and reliably.&nbsp; People will give up their EV's if they find that the chargers don't work the first time, every time.&nbsp; Like their experience at the gas station.</p>

<p>You all must ensure that there are standards and that EVSE companies can't just put anything up that is not really fully functional.&nbsp; So my request to you is :&nbsp; Set standards for reliability and enforce them!</p>

<p>&nbsp;</p>

<p>&nbsp;</p>

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2022-04-28 09:47:49

No Duplicates.

## Comment 4 for Informational Update on the Electric Vehicle Supply Equipment Standards Technology Review (evseupdate). (At Hearing)

First Name: Sue

Last Name: Saunders

Email Address: indivisiblerossvally@gmail.com

Affiliation:

Subject: Comments on EVSE Standards Technology Review

Comment:

I cannot emphasize enough the frustration EV drivers experience with non Tesla DC fast charging, especially lower income who drive earlier models that can only afford models whose batteries only have a low range of miles. Recently while charging I chatted with a driver who owned one of the first Leafs who told me he doesn't have the miles to experience a non-functioning charger and has spent hours on the phone with the company to get the charge to initiate. "I don't regret driving an EV, but the chargers are a nightmare."

Recently, I tried to help an older couple get a charge initiated for their brand new Ford Mach E. We were outside a Walmart in Santa Rosa baking in the sun. The husband had tried repeatedly to get the charger to start. He tried his app, he tried a credit card, and he tried plugging in again and again to get the machine to give him the miles he needed to get home after a trip to the wine country. He asked his wife to help and then grew frustrated and began to yell at her. I tried letting them use my app, but nothing worked.

Here was a couple trying to do the right thing by driving a car with zero emissions to fight climate change and air pollution. People doing the right thing shouldn't have to suffer because our DCFC rollout causes doesn't function. I have yet to meet an EV driver who isn't angry and 20% go back to gas cars because of this.

transparent; font-variant-numeric: normal; font-variant-east-asian: normal; vertical-align: baseline; white-space: pre-wrap;">We have to have enforceable standards for any EVSE getting public and federal dollars. This means a mandatory escrow account with funds devoted to maintenance so the companies can&rsquo;t ignore this critical component; mandatory reporting of data with a 97% uptime requirement. The Air Resource Board and the California Energy Commission need to commit to funding a unit charged with holding companies accountable.&nbsp;

&nbsp;

<span style="font-size: 11pt; font-family: Arial; background-color: transparent; font-variant-numeric: normal; font-variant-east-asian: normal; vertical-align: baseline; white-space: pre-wrap;">I recently drove to Santa Cruz and saw on my plug share app a fast charger I needed to get enough miles to reach my destination. The winding hills took me by surprise and quickly depleted my miles. When I got to the fast charger both wouldn&rsquo;t start with either of my two credit cards or my app. I was down to thirty miles and that is a horrible feeling I have experienced several times because of broken or malfunctioning chargers. Luckily I could drive to another location with a charger that worked.&nbsp;

&nbsp;

<span style="font-size: 11pt; font-family: Arial; background-color: transparent; font-variant-numeric: normal; font-variant-east-asian: normal; vertical-align: baseline; white-space: pre-wrap;">We cannot go on like this and cannot expect an equitable transition to zero emission vehicles if this isn&rsquo;t immediately fixed. Residents living in apartments or other Multi Unit Dwelling have no other option and depend on fast charging to work. Asking them to suffer from a dysfunctional system while homeowners have the luxury of charging at home isn&rsquo;t just or fair. Companies need to fix their existing system before they receive any additional funding and then the funding provided must mandate a worry free infrastructure. Anything less is a recipe for a return to gas cars and allowing climate change and air pollution to destroy our state. This can be done and I fully expect it will be.</span></p>

<span style="font-size: 11pt; font-family: Arial; background-color: transparent; font-variant-numeric: normal; font-variant-east-asian: normal; vertical-align: baseline; white-space: pre-wrap;">&nbsp;</span></p>

<span style="font-size: 11pt; font-family: Arial; background-color: transparent; font-variant-numeric: normal; font-variant-east-asian: normal; vertical-align: baseline; white-space: pre-wrap;">Respectfully,</span></p>

<span style="font-size: 11pt; font-family: Arial; background-color: transparent; font-variant-numeric: normal; font-variant-east-asian: normal; vertical-align: baseline; white-space: pre-wrap;">&nbsp;</span></p>

<span style="font-size: 11pt; font-family: Arial; background-color: transparent; font-variant-numeric: normal; font-variant-east-asian: normal; vertical-align: baseline; white-space: pre-wrap;">&nbsp;</span></p>

normal; vertical-align: baseline; white-space: pre-wrap;">Susannah  
Saunders</span></p>  
<p dir="ltr" style="margin: 0pt 0em; line-height: 1.38;"><span  
style="font-size: 11pt; font-family: Arial; background-color:  
transparent; font-variant-numeric: normal; font-variant-east-asian:  
normal; vertical-align: baseline; white-space: pre-wrap;">Founder  
of  
Indivisible Ross Valley</span></p>

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2022-04-28 10:38:55

No Duplicates.

## Comment 5 for Informational Update on the Electric Vehicle Supply Equipment Standards Technology Review (evseupdate). (At Hearing)

First Name: Sue

Last Name: Saunders

Email Address: indivisiblerossvally@gmail.com

Affiliation:

Subject: Comments on EVSE Standards Technology Review

Comment:

`<p dir="ltr" style="background-color: #ffffff; line-height: 1.38; margin-top: 0pt; margin-bottom: 0pt;"><span style="font-size: 11pt; font-family: Arial; background-color: transparent; font-variant-numeric: normal; font-variant-east-asian: normal; vertical-align: baseline; white-space: pre-wrap;">I cannot emphasize enough the frustration EV drivers experience with non Tesla DC fast charging, especially lower income who drive earlier models that can only afford models whose batteries only have a low range of miles. Recently while charging I chatted with a driver who owned one of the first Leafs who told me he doesn't have the miles to experience a non-functioning charger and has spent hours on the phone with the company to get the charge to initiate. &ldquo;I don&rsquo;t regret driving an EV, but the chargers are a nightmare.&rdquo; </span></p>`

`<p style="background-color: #ffffff;"><span id="m_5214993743840682518gmail-docs-internal-guid-cb2ec552-7fff-2a3f-3656-4f3c9bf569a1">&nbsp;</span></p>`

`<p dir="ltr" style="background-color: #ffffff; line-height: 1.38; margin-top: 0pt; margin-bottom: 0pt;"><span style="font-size: 11pt; font-family: Arial; background-color: transparent; font-variant-numeric: normal; font-variant-east-asian: normal; vertical-align: baseline; white-space: pre-wrap;">Recently, I tried to help an older couple get a charge initiated for their brand new Ford Mach E. We were outside a Walmart in Santa Rosa baking in the sun. The husband had tried repeatedly to get the charger to start. He tried his app, he tried a credit card, and he tried plugging in again and again to get the machine to give him the miles he needed to get home after a trip to the wine country. He asked his wife to help and then grew frustrated and began to yell at her. I tried letting them use my app, but nothing worked. </span></p>`

`<p style="background-color: #ffffff;">&nbsp;</p>`

`<p dir="ltr" style="background-color: #ffffff; line-height: 1.38; margin-top: 0pt; margin-bottom: 0pt;"><span style="font-size: 11pt; font-family: Arial; background-color: transparent; font-variant-numeric: normal; font-variant-east-asian: normal; vertical-align: baseline; white-space: pre-wrap;">Here was a couple trying to do the right thing by driving a car with zero emissions to fight climate change and air pollution. People doing the right thing shouldn&rsquo;t have to suffer because our DCFC rollout causes doesn&rsquo;t function. I have yet to meet an EV driver who isn&rsquo;t angry and 20% go back to gas cars because of this.&nbsp;</span></p>`

`<p style="background-color: #ffffff;">&nbsp;</p>`

`<p dir="ltr" style="background-color: #ffffff; line-height: 1.38; margin-top: 0pt; margin-bottom: 0pt;"><span style="font-size: 11pt;`



font-family: Arial; background-color: transparent;  
font-variant-numeric: normal; font-variant-east-asian: normal;  
vertical-align: baseline; white-space: pre-wrap;">We have to have enforceable standards for any EVSE getting public and federal dollars. This means a mandatory escrow account with funds devoted to maintenance so the companies can't ignore this critical component; mandatory reporting of data with a 97% uptime requirement. The Air Resource Board and the California Energy Commission need to commit to funding a unit charged with holding companies accountable.</span></p>  
<p style="background-color: #ffffff;"><span style="font-size: 11pt; font-family: Arial; background-color: transparent; font-variant-numeric: normal; font-variant-east-asian: normal; vertical-align: baseline; white-space: pre-wrap;">I recently drove to Santa Cruz and saw on my plug share app a fast charger I needed to get enough miles to reach my destination. The winding hills took me by surprise and quickly depleted my miles. When I got to the fast charger both wouldn't start with either of my two credit cards or my app. I was down to thirty miles and that is a horrible feeling I have experienced several times because of broken or malfunctioning chargers. Luckily I could drive to another location with a charger that worked.</span></p>  
<p style="background-color: #ffffff;"><span style="font-size: 11pt; font-family: Arial; background-color: transparent; font-variant-numeric: normal; font-variant-east-asian: normal; vertical-align: baseline; white-space: pre-wrap;">We cannot go on like this and cannot expect an equitable transition to zero emission vehicles if this isn't immediately fixed. Residents living in apartments or other Multi Unit Dwelling have no other option and depend on fast charging to work. Asking them to suffer from a dysfunctional system while homeowners have the luxury of charging at home isn't just or fair. Companies need to fix their existing system before they receive any additional funding and then the funding provided must mandate a worry free infrastructure. Anything less is a recipe for a return to gas cars and allowing climate change and air pollution to destroy our state. This can be done and I fully expect it will be.</span></p>  
<p dir="ltr" style="background-color: #ffffff; line-height: 1.38; margin-top: 0pt; margin-bottom: 0pt;"><span style="font-size: 11pt; font-family: Arial; background-color: transparent; font-variant-numeric: normal; font-variant-east-asian: normal; vertical-align: baseline; white-space: pre-wrap;"></span></p>  
<p dir="ltr" style="background-color: #ffffff; line-height: 1.38; margin-top: 0pt; margin-bottom: 0pt;"><span style="font-size: 11pt; font-family: Arial; background-color: transparent; font-variant-numeric: normal; font-variant-east-asian: normal; vertical-align: baseline; white-space: pre-wrap;">Respectfully,</span></p>  
<p dir="ltr" style="background-color: #ffffff; line-height: 1.38; margin-top: 0pt; margin-bottom: 0pt;"><span style="font-size: 11pt; font-family: Arial; background-color: transparent; font-variant-numeric: normal; font-variant-east-asian: normal; vertical-align: baseline; white-space: pre-wrap;"></span></p>  
<p dir="ltr" style="background-color: #ffffff; line-height: 1.38; margin-top: 0pt; margin-bottom: 0pt;"><span style="font-size: 11pt; font-family: Arial; background-color: transparent;

font-variant-numeric: normal; font-variant-east-asian: normal;  
vertical-align: baseline; white-space: pre-wrap;">Susannah  
Saunders</span></p>  
<p dir="ltr" style="background-color: #ffffff; line-height: 1.38;  
margin-top: 0pt; margin-bottom: 0pt;"><span style="font-size: 11pt;  
font-family: Arial; background-color: transparent;  
font-variant-numeric: normal; font-variant-east-asian: normal;  
vertical-align: baseline; white-space: pre-wrap;">Founder of  
Indivisible Ross Valley</span></p>

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2022-04-28 10:53:06

No Duplicates.

## **Comment 6 for Informational Update on the Electric Vehicle Supply Equipment Standards Technology Review (evseupdate). (At Hearing)**

First Name: David

Last Name: Moller, P.E.

Email Address: david@mollers.us

Affiliation: Marin/Sonoma EV Squad

Subject: Comment for CARB April 28, 2022 Hearing on EVSE Stds.Technology Review  
Comment:

`<p class="MsoNormal"><span style="font-size: 12.0pt;">This is to request that CARB to take action to improve and assure the reliability of the open access public DC fast charging system for EVs here in California.&nbsp;&nbsp;&nbsp;It&rsquo;s clear that a reliable charging system is achievable, as demonstrated by Tesla, but comparability reliability has not been achieved by other charging service providers.&nbsp;&nbsp;&nbsp;It&rsquo;s critical to get this right in support of accelerating the adoption of EVs. </span><span style="font-size: 12pt;">&nbsp;</span></p>  
<p class="MsoNormal"><span style="font-size: 12.0pt;">CARB is in a unique position to make this happen by adding to contracts for public funding of EV charging infrastructure enforceable conditions for uptime and reliability as well as penalties for noncompliance.&nbsp;&nbsp;&nbsp;CARB may also be able to take action to improve the reliability of existing charging stations.&nbsp;</span><span style="font-size: 12pt;">&nbsp;</span></p>  
<p class="MsoNormal"><span style="font-size: 12.0pt;">It&rsquo;s clear that the private sector is not going to solve this problem quickly on its own absent strong and compelling government action.&nbsp;</span> Please take that action now!</span></p>`

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2022-04-28 10:57:14

No Duplicates.

## **Comment 7 for Informational Update on the Electric Vehicle Supply Equipment Standards Technology Review (evseupdate). (At Hearing)**

First Name: Natalie

Last Name: Nax

Email Address: natalie@caleec.com

Affiliation: Electric Vehicle Charging Association

Subject: EVCA Comments on the EVSE Technology Review

Comment:

`<p style="color: #3c4043; font-family: Roboto, Arial, sans-serif; font-size: 14px; letter-spacing: 0.2px; white-space: pre-wrap; background-color: #ffffff;">The Electric Vehicle Charging Association is a non-profit trade association comprised of 15 companies across the EV ecosystem dedicated to increasing EV adoption through innovation, competition, and business model inclusivity.</p>`

`<p style="color: #3c4043; font-family: Roboto, Arial, sans-serif; font-size: 14px; letter-spacing: 0.2px; white-space: pre-wrap; background-color: #ffffff;">&nbsp;</p>`

`<p style="color: #3c4043; font-family: Roboto, Arial, sans-serif; font-size: 14px; letter-spacing: 0.2px; white-space: pre-wrap; background-color: #ffffff;">EVCA greatly appreciates ARB's raising the issue of charger reliability &ndash;&ndash; there is a lot of activity happening on this topic already at both the federal and state level. First, 3 of our members are sponsoring two pieces of legislation this year to address EV charging reliability, and the Energy Commission is conducting a robust stakeholder process to increase reliability requirements. Second, the Public Utilities Commission is discussing the importance of reliability requirements via a filing from PG&E, and finally, the Federal Highway Administration is currently developing reliability requirements for the EV charging funds it is rolling out to all 50 states, including California.</p>`

`<p style="color: #3c4043; font-family: Roboto, Arial, sans-serif; font-size: 14px; letter-spacing: 0.2px; white-space: pre-wrap; background-color: #ffffff;">&nbsp;</p>`

`<p style="color: #3c4043; font-family: Roboto, Arial, sans-serif; font-size: 14px; letter-spacing: 0.2px; white-space: pre-wrap; background-color: #ffffff;">Given these existing processes, we believe the state is taking meaningful, concrete action to address this topic. We would be happy to brief ARB board members in more detail about these processes and incorporate their concerns and feedback into our work on this issue.</p>`

`<p style="color: #3c4043; font-family: Roboto, Arial, sans-serif; font-size: 14px; letter-spacing: 0.2px; white-space: pre-wrap; background-color: #ffffff;">&nbsp;</p>`

`<p style="color: #3c4043; font-family: Roboto, Arial, sans-serif; font-size: 14px; letter-spacing: 0.2px; white-space: pre-wrap; background-color: #ffffff;">Thank you for your consideration</p>`

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2022-04-28 13:31:22

No Duplicates.

**Comment 8 for Informational Update on the Electric Vehicle Supply Equipment Standards Technology Review (evseupdate). (At Hearing)**

First Name: Jay

Last Name: Friedland

Email Address: jay@pluginamerica.org

Affiliation: Plug In America

Subject: Comments to the Board on the EVSE Regulation Technology Review

Comment:

<p>Please see our comments attached below. Thank you!</p>

Attachment: [www.arb.ca.gov/lists/com-attach/18-evseupdate-UzYFdVEjWG4EcFUw.pdf](http://www.arb.ca.gov/lists/com-attach/18-evseupdate-UzYFdVEjWG4EcFUw.pdf)

Original File Name: EVSERegulation\_TechnologyReview\_Support\_PIA\_042822.pdf

Date and Time Comment Was Submitted: 2022-04-28 13:38:56

No Duplicates.