



195 Forbes Ave.
San Anselmo, CA 94960

January 25, 2024

California Air Resources Board

Re: Electrify America's Proposed Cycle 4 Zero Emission Vehicle Investment Plan

I am an energy engineer with over 30 years of experience in energy efficiency and renewable energy, and have provided technical consulting services to the CEC, CA utilities and Department of Energy labs. I am also a board member of Cool the Earth and was one of the authors of the 2022 fast charger reliability study led by UC Berkeley.

We tested every open-system DC Fast Charger in the Bay Area. 655 chargers total. Of these, 378, or nearly 60%, were Electrify America chargers. We found that 21% of the Electrify America chargers were not functional and 4% had cables that were too short to reach a Chevy Bolt. The causes of failure were blank screens, error codes, payment system failures, and failure to start charging. The problems were due to broken components and software and design problems.

We shared the details with Electrify America and CARB staff. Upon retesting chargers in Alameda and San Mateo counties four months later, little had changed, indicating a lack of maintenance.

We submitted a copy of the published, peer-reviewed Berkeley study to the docket.

There have been similar findings from large surveys of EV drivers. A 2023 study by JD Power found a 20% failure rate in charging attempts industry-wide. Additionally, they reported customer satisfaction is at an all-time low, with Electrify America receiving a satisfaction score of only 538 out of 1000.

We appreciate that Electrify America has promised to prioritize reliability going forward. However, we urge CARB to reject Electrify America's current plan and modify the plan to mandate explicit metrics to improve functionality, bringing requirements in alignment with the CEC and Federal NEVI EV charger standard of 97% uptime.

Regards,

A handwritten signature in black ink that reads 'Mary M Bryan'.

Mary Matteson Bryan, P.E.