



February 28, 2022

California Air Resources Board (ARB)  
1001 I Street  
Sacramento, CA 95814

**RE: EVgo Comments on ARB Electric Vehicle Supply Equipment Technology Review**

Dear Board Members and Staff:

EVgo appreciates the California Air Resources Board's (ARB) continued stakeholder engagement in the development and implementation of the Electric Vehicle Supply Equipment (EVSE) Standards. EVgo recognizes ARB's goal of ensuring that all Californian's have access to EV charging infrastructure as the state transitions to a fully electrified transportation system.

With more than 800 fast charging locations, EVgo's owned and operated charging network serves over 68 metropolitan areas across 35 states and more than 310,000 customer accounts. Headquartered in Los Angeles, EVgo's fast charging network includes than 330 sites and 820 fast charging stalls across California. EVgo is powered by 100% renewable energy.

EVgo thanks ARB staff for its work on the EVSE Standards Technology Review (Technology Review) and was a respondent to the survey extended to EV Service Providers (EVSPs). The Technology Review provides an opportunity to continue evaluating the best minimum payment methodology standards to make charging stations more accessible for the drivers of today and tomorrow through a data driven approach. Importantly, EVgo reiterates support for ARB to modify the standards to include tap and contactless credit card payment as a minimum payment method.

Following the release of the Technology Review, EVgo respectfully offers the select comments ahead of the ARB Board Meeting in April:

**1. Consider alignment with federal infrastructure technical standards for EVSE and provide annual updates to the Technology Review.**

While staff concluded not to include contactless credit card readers as a compliance payment method at this time, it is imperative that ARB continue to revisit its Technology Review to ensure that California is not missing out on investments. Notably, federal guidance for the National Electric Vehicle Investment (NEVI), which is expected to provide guidance on areas that fall under the EVSE standards regulatory scope, including payment facilitation, display, source, and pricing information, will be released in May. Additionally, tax incentives for EVSE are being actively discussed in a follow-on congressional package and most recently only included contactless payment.

As noted above, a near term update to the Technology Review may be necessary in light of expected near-term updates at the federal level. EVgo also suggests ARB commit to an annual update to the Technology Review, similar to the CEC's annual SB 1000 reports analyzing the state's gaps in charging infrastructure,

with a scope relating to the updates of contactless credit card adoption, giving ARB the most up to date data and minimizing potentially unnecessary hardware expenses.

**2. Revisit suggestion of a disconnect between charger reliability and EVSP reports of network uptime. Further study reliability in coordination with the California Energy Commission and EVSPs.**

In the Technology Review’s self-reported survey of drivers, ARB staff surveyed the top reason for customer calls, with charger malfunction as the top reason. This is logical, as customers contact any service provider when the product is malfunctioning, not when everything is working as it should. Further, the Technology Review states that there may be a “disconnect” between what EVSPs are reporting and the on the ground realities of charger reliability. Given that staff did not include uptime information from all EVSPs, with only 4 of the 11 EVSPs responding to ARB’s survey question regarding charger uptime, the Technology Review cannot suggest discrepancies with EVSPs who have reported uptime data and customer experience. While uptime can be quantified<sup>1</sup> and is measurable, the “disconnect” noted by ARB was not and thus should be struck from the Review.

A positive customer experience and access to reliable charging infrastructure is imperative to successful electrification. EVgo supports staff’s conclusion that this issue needs to be studied further and recommends that ARB coordinate directly with the California Energy Commission (CEC) and EVSPs as both have experience with uptime and reliability. EVgo offers itself as a resource as ARB staff looks at further education on EV charging uptime and reliability.

**3. Further explore the benefits of tap and contactless payment methods to serve unbanked and underbanked drivers, as well as best practice programs being administered by the air districts.**

Staff recommends in the Review to conduct “a research study or pilot project to evaluate how people, particularly low-income residents, pay for transportation services, including public EV charging.” EVgo offers its own experience of enabling greater access to EV charging for income qualified customers through partnerships. Specifically, in California, with the Sacramento Metropolitan Air Quality Management District to offer charging credits at EVgo stations to eligible participants in SMUD’s Clean Car 4 All program.<sup>2</sup>

Further, EVgo partners with Grid Alternatives under the Clean Vehicle Assistance Program to offer income-qualified Californians who may not have access to dedicate or at-home charging, access to public charging through a \$1,000 prepaid charge credit valid at public EVgo charging stations.<sup>3</sup> It is important to note that between the options of at-home charging or pre-paid charge credits, drivers overwhelmingly opt for the charge credit due to the difficulties of installing at home chargers, further highlighting the need for robust

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<sup>1</sup> EVgo’s owner-operator model aligns charging network interests with those of its EV driving customers. Thus, reliability is key to EVgo’s network economics and the driver’s ability to receive a charge. EVgo prides itself on its reliability, with a 98% uptime rate across its network.

<sup>2</sup> <https://www.evgo.com/press-release/sac-metro-air-district-partners-with-evgo-provide-public-ev-charging-clean-cars-4-all-participants/>

<sup>3</sup> <https://cleanvehiclegrants.org/charging-stations/>

public charging access. EVgo supports growth of these programs statewide as a tangible method for increasing access to charging infrastructure.

### Conclusion

EVgo thanks ARB staff for consideration of EVgo's comments as it plans its April presentation to the Board. EVgo looks forward to continuing partnering with the state to deliver a fully electrified transportation system and provide all Californians with convenient, reliable access to charging infrastructure.

Best,

A handwritten signature in black ink, appearing to read "Adam Mohabbat", with a stylized flourish at the end.

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