



June 24, 2019  
LEG 19-0143

California Air Resources Board  
1001 I Street  
Sacramento, CA 95814

**Re: Sacramento Municipal Utility District (SMUD) Comments to proposed Senate Bill 454 Regulation on Electric Vehicle Supply Equipment (EVSE) Standards**

SMUD would like to thank CARB and its staff on the opportunity to provide comments on the draft proposed Senate Bill (SB) 454 Regulation Order regarding EVSE Standards. SMUD operates a small network of public chargers in Sacramento County that would be subject to the regulation. In addition, SMUD supports customers in our service territory installing public charging infrastructure through several incentive programs. Our primary comments are regarding the proposed timeline for implementation. We also comment on the reporting requirements.

SMUD recommends additional time for newly installed EVSE to comply with the requirements and additional time before existing EVSE must be retrofitted to comply with the requirements.

Currently there is a large acceleration of public charging infrastructure installations ongoing in Sacramento in conjunction the California Electric Vehicle Infrastructure Program (CalEVIP) sponsored by the California Energy Commission. The EVSEs being installed under this effort were not configured to meet the requirements included in the draft SB 454 regulation. We expect a majority of CalEVIP related infrastructure installations to occur over the next 18 months. The current proposed date of July 1, 2020 by which new EVSEs must meet the proposed interoperability requirements is likely to fall right in the middle of the CalEVIP EVSE installation schedule. SMUD recommends that implementation requirements for newly installed public charging infrastructure be delayed by at least one year, until July 1, 2021, or later, to allow most if not all of the CalEVIP installations to proceed unimpeded. Timely CalEVIP deployment will help accelerate the deployment of charging infrastructure in Sacramento County and support the associated adoption of additional electric vehicles.

Since a large number of EVSE units are being installed under the CalEVIP effort in the next few years, SMUD also recommends a longer timeframe before these newly-installed EVSEs must be retrofit to meet the proposed requirements. Brand new EVSE hardware has an expected operational life of 10 years or more, and the current 5 year retrofit timeline in the proposed regulation may result in stranded costs as operational EVSE must be removed or be retrofit to meet the requirements. SMUD recommends that the deadline for retrofitting existing EVSEs to comply with the proposed requirements be extended by an additional 5 years, establishing a 10-year period, starting on the date that requirements are effective for newly installed EVSEs.

The above recommended revisions to the retrofit time schedule will support the already planned investments in EVSE hardware deployment that would occur just prior to the regulation going into effect.

With respect to reporting requirements, SMUD recommends that CARB consider the option of aggregated reporting requirements for the information related to the total number of charging sessions associated with each type of payment method. The regulation currently requires that information be supplied for every EVSE operated in California. Given that hundreds of thousands of EVSE units could be expected in the future, this amount of data for each unit would tend to result in a very large data base that could be difficult and costly to analyze for future purposes. Aggregating the charging session payment initiation data by EVSE model or type may provide useful data in a consolidated form that could be easier and less costly to analyze.

Thank you for the opportunity to make comments on the proposed regulations.

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/s/

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cc: Corporate Files (LEG 2019-0143)