



February 28, 2022

Ms. Stephanie Palmer
Air Resources Engineer, Zero Emission Vehicle Market Advancement Section
California Air Resources Board
1001 I Street
Sacramento, CA 95814

RE: EVCA Comments on the EVSE Technology Review

The Electric Vehicle Charging Association (EVCA) is a not-for-profit organization comprised of leaders throughout the value chain of the electric vehicle (EV) charging industry to advance the goal of a clean transportation system in which the market forces of innovation, competition, and consumer choice drive the expeditious and efficient adoption of EVs and deployment of EV charging infrastructure.

EVCA thanks the California Air Resources Board (CARB) for the opportunity to comment on the Electric Vehicle Supply Equipment Technology Review (Technology Review). EVCA believes this analysis is essential to CARB administering and updating its Electric Vehicle Charging Station Open Access regulation. Given that the market is continually evolving in its development and use of payment technologies, it is critical for CARB to conduct the Technology Review at consistent intervals to ensure its regulation reflects technology and consumer use trends.

Upon initial review, EVCA recommends future Technology Reviews to address the following unanswered questions below. We believe this will better define the scope and extent of the problem CARB is trying to resolve with its regulation, thus enabling it to better refine its regulation as needed to increase consumer access to charging stations

1. How do varying payment technologies and associated equipment differ in their reliability, if at all? and how does that impact overall station reliability?
2. If there are issues in reliability with any payment technologies, what are the cost impacts, if any, with repairing them?
3. What percentage of Californians are unbanked and/or rely solely on pre-paid debit/credit cards?
4. What percentage of unbanked Californians are interested in purchasing an EV?
5. What other payment methods do unbanked Californians use?

Given that the Technology Review cited “inoperable stations” as a top issue reported by respondents, we believe a more in-depth analysis of the reliability of payment technologies is an important underlying consideration to this regulation. Furthermore, given that CARB is addressing payment access issues for unbanked Californians, we believe more data is needed, as noted with questions 3 and 4 above, to understand the extent of the problem. We encourage CARB to work with third party researchers, who can help design robust effective surveys and additional research methods to answer these questions.

The Technology Review also, after conducting an assessment of contactless payment penetration and use in the U.S., concluded it was not yet prevalent enough to justify amending the regulation to allow charging station companies to use that technology to comply with the regulation. We encourage CARB, in the next iteration of the Technology Review, to specify a standard that contactless payment technology must meet to be considered widely accessible to unbanked Californians. Providing a clear standard gives industry certainty on a specific end goal CARB wants the market to work toward.

We look forward to continued collaboration on this topic. Thank you for your consideration.

Respectfully,

Reed Addis
Governmental Affairs
Electric Vehicle Charging Association