


From: Carleen Cullen ccullen@cooltheearth.org 

Subject: Follow-up regarding Electrify America unreliability

Date: January 23, 2024 at 10:19 AM

To: Liane@ARB Randolph liane.randolph@arb.ca.gov

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Chair Randolph,

Thank you for meeting with us yesterday. We share and support your concern about unreliable EV charging stations. EA's Cycle 4 ZEV Investment Plan presents a critical juncture to substantially improve the performance of EV charging stations in California.

Attached are our recommendations for enhancing the reliability of Electrify America's charging stations. Designed within the existing consent decree's framework, they aim to benefit all consumers, especially those in low-income and disadvantaged communities, and align with CARB's and the state's climate goals.

Electrify America's reports in their Cycle Three and Four ZEV investment plans acknowledge significant reliability issues. Their Cycle Four Plan points to an industry-wide failure rate of one in five charging attempts, adversely affecting EV adoption rates. Given Electrify America's status as the largest public EV charging network, their impact on these statistics is considerable. This failure rate is contrary to the objectives of the Consent Decree.

We urge CARB to reject the parts of the ZEV Investment Plan that pertain to reliability upgrades and replacements. We recommend directing staff to meet and confer with Electrify America to create a more robust plan. In this process, we would be happy to engage with staff to provide expert recommendations informed by my involvement in the ChargeX consortium, ensuring the metrics for station replacement are thorough and effective.

We have also attached a PDF of the Berkeley study.

Your leadership in addressing these issues is greatly valued.

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