



[www.electrictauto.org](http://www.electrictauto.org)

June 3, 2019

Comments on EVSE standards

California Air Resources Board

Dear Members of the Board,

The Electric Auto Association is America's oldest member supported electric vehicle advocacy group. Our mission is to accelerate the adoption of electric vehicles.

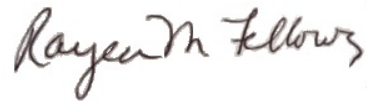
Thank you for the opportunity to comment on EVSE standards. The EAA believes that a "one-size fits all" standard may not be in the best interest of accelerating EV adoption. As we read through CARB's proposed standard and extrapolate out into the future, we see the potential for unintended consequences. Specifically, standards that should apply to DCFC may not be desirable or necessary for L2 AC charging. Standards that should apply to networked infrastructure should not be applied to non-networked infrastructure. Lastly, standards that should apply to public infrastructure in a commercial environment, should not be applied at the workplace, multi-unit developments or schools.

We ask CARB to consider the following points.

1. The proposed standards should not apply to Level 2 AC EVSE that are free to use.
  - The EAA is concerned about overburdening would-be providers. The cost of an AC L2 EVSE is relatively low, as is the commodity it dispenses. The recurring costs of networking, reporting and handling credit card transactions all dwarf the EVSE and energy dispensed.
2. The proposed standards should not apply to non-networked charging infrastructure.
  - The same comment applies; the recurring costs will dwarf the costs of the EVSE and energy dispensed. This will have a chilling effect on small businesses who might just want to incentive patrons to charge while they shop.
3. Public EVSEs should be defined to exclude charging infrastructure installed in the workplace, multi-unit developments or schools. Perhaps it would be best to define "public" as "commercially available."
  - As an example, my local elementary and high schools have a large number of

EVSEs for the employees in publicly available parking lots. These are available to neighbors after school hours. The proposed regulations may cause the schools to discontinue allowing the public access.

Sincerely,

A handwritten signature in dark ink, reading "Raejean M. Fellows". The signature is written in a cursive, flowing style.

Raejean Fellows  
ev.policy@electricauto.org  
President, Electric Auto Association

**We are over 1,000,000 electric vehicle owners in the United States and growing!**