



April 5, 2022

California Air Resources Board
1001 I St.
Sacramento, CA 95814

RE: Public Meeting on EVSE Standards Technology Review

Dear California Air Resources Board Members:

I am writing on behalf of SemaConnect with comments for the April 28 public meeting of the Air Resources Board on the Electric Vehicle Supply Equipment Standards Technology Review.¹

SemaConnect is a leading developer, manufacturer and provider of plug-in, zero-emission infrastructure (ZEV) including commercial-grade electric vehicle (EV) charging systems and comprehensive network services. SemaConnect's plug-in ZEV infrastructure is deployed in a wide range of applications that include multifamily, workplace, fleet, and public charging across California and nationwide.

As the market share of electric vehicles continues to grow, affordable and easily accessible EV charging will be essential. With charging stations being deployed in ever greater numbers, drivers also will need a range of payment options to improve their familiarity with charging an EV, particularly in public locations.

SemaConnect offers an industry leading full-replacement service as our primary method for maintenance. In most cases, rather than attempting to repair a unit we will swap it with another unit; the serial number will change, but all features remain identical. We believe this best serves our customers and drivers because it minimizes downtime and best ensures a successful repair.

However, as defined by Chapter 8.3 of Division 3, Title 13, California Code of Regulation, replacement of an existing Level 2 EVSE head unit after July 1, 2023, will require us to end our full replacement warranty service in California. Instead, from that date on, we only will be able to offer less convenient repairs for existing stations. This will likely involve shipping the unit back to a central location so we can perform a repair. In the event that we can provide even a temporary unit for a limited duration (until repairs to an original unit are complete), an electrician must make two trips to the site which is inconvenient for both property management and customers.

¹ California Air Resources Board, "Electric Vehicle Supply Equipment Standards Technology Review," February 2022: https://ww2.arb.ca.gov/node/18496?utm_medium=email&utm_source=govdelivery



We respectfully request that the Air Resources Board grant an exception for “replace to repair” maintenance solely for Level 2 stations installed before the July 1, 2023 deadline. A disabled charging station can be swiftly replaced with an identical unit with minimal cost and service disruption. We believe this will benefit customers and drivers with negligible impact on the adoption of specific payment technologies.

Recognizing that access to EV charging should be widely available, we support the Air Resources Board’s efforts to carefully monitor new payment technologies that provide a superior customer experience, which will be important as EV adoption increases.

To meet growing demand for retail EV chargers, last year SemaConnect introduced the [Series 8 charging station](#). The Series 8 is a Level 2 electric vehicle charging station with SemaConnect’s signature slim design, interactive LED lights, and easy-to-use network platform. Featuring a versatile credit card reader (enabled for payment by chip, magnetic stripe, and contactless), and other flexible payment options, the Series 8 provides access to all EV drivers regardless of charging network affiliation. Station owners can set custom access and pricing to support multi-user needs, and EV drivers are not required to have a SemaConnect account to use the Series 8 charging station.

In closing, we appreciate the Air Resources Board’s commitment to ensuring that EV charging is widely available, affordable, and easily accessible to the public.

Sincerely,

[submitted electronically]

Matthew E. Chen
Director, Government Policy & Programs
SemaConnect