



June 27, 2019

California Air Resources Board
1001 I Street
Sacramento, CA 95814

Re: EV Charging Stations Open Access Act Rulemaking (SB 454) – FreeWire Comments on ARB’s Proposed Regulation Adopting an EVSE Standard

Dear Chair Nichols, Members of the Board, and ARB Staff:

FreeWire Technologies (FreeWire) is a California manufacturer of battery-integrated solutions for EV charging that overcome grid constraints and the high cost and lengthy timeframes associated with the deployment of traditional electric vehicle supply equipment (EVSE).

FreeWire appreciates the opportunity to comment on the above-referenced proposed EVSE Standard. While we agree with ARB’s intent through this regulation to better provide for universal access to publicly available charging stations, especially in disadvantaged communities (DACs), FreeWire believes that the proposed regulation should be modified in order to avoid certain unintended consequences that may have significant negative impacts on innovation in our industry as well as the overall deployment of EVSE in California.

In addition to the points raised in our joint comments on the regulation with other EVSE manufacturers, providers and operators, FreeWire suggests that ARB make the following revisions to the proposed regulation:

1. *The reporting requirements should not apply to EVSE that are offered for use free of charge.* FreeWire recognizes and appreciates ARB’s interest in obtaining meaningful data about charging and access thereto. However, the cost and administrative burden of complying with the reporting requirements would meaningfully deter the continued operation and buildout of charging stations for free public use. Fundamentally, the imposition of the proposed requirements on free charging stations runs counter to ARB’s stated desire to ensure access to charging in DACs. Therefore, the reporting requirements should be voluntary for charging stations offered for use free of charge.
2. *The initial reporting deadline should be shortened, from “at least 45 days” to “at least 15 days” prior to completing installation.* One advantage of FreeWire’s infrastructure-light charging systems relative to traditional fixed charging stations is that they can be installed in a fraction of the time. Our Mobi product is a mobile EVSE that is effectively ready to be deployed instantly upon delivery, while the estimated installation timeframe for our Boost Charger, a stationary DCFC system, is less than one month. Requiring initial reporting 45 or more days before completing installation could delay the process and runs counter to the state’s goal of rapidly building out charging infrastructure necessary meet California’s ambitious emission reduction targets within the



transportation sector. In addition, use of the term “installation” should be clarified by specifying that the reporting deadline is triggered by the completion of installation.

3. *The EVSE Standard should not apply to mobile or non-networked charging systems, and should not require a credit card reader on the unit or at a kiosk so long as a physical credit card payment option is available.* FreeWire’s Mobi L2 and Gen systems are mobile battery-integrated charging systems, designed to operate at the grid edge and provide power and charging capabilities in a flexible manner. One scenario wherein the Mobi could provide publicly available charging for payment would be at public parking facilities, where a driver would request charging from an attendant or through an app, and an operator would deliver charging with the mobile charger. In such a transaction, the driver would never be interfacing with the charger itself, and instead payment would be made to the parking attendant or through the app. The regulation should therefore except mobile systems, or else simply specify that a physical credit card payment option be available rather than mandating a credit card reader located on the EVSE or a kiosk. In addition, ARB should except non-networked charging systems from the payment and reporting requirements. Many remote locations lack the networking infrastructure necessary to initiate and verify credit card payment or comply with the reporting requirements. As such, FreeWire recommends a tighter definition of EVSP to exclude mobile chargers as well as entities that provide charging for free or through non-networked EVSE.
4. *The definition of “publicly available” should be revised to properly align with the law authorizing the proposed regulations by clarifying that charging stations primarily used for workplace and multi-unit dwellings be exempted from the regulation.* Many charging stations are underutilized across the state, and a key to increasing utilization of these assets is encouraging shared use. By subjecting workplace and multi-unit dwelling chargers made available for visitors as a secondary use, where these assets are primarily used by employees or residents, ARB is in effect disincentivizing higher utilization of these assets. Furthermore, the proposed definition runs counter to the plain language of the authorizing statute.

FreeWire Technologies appreciates the opportunity to provide input on the proposed regulations. Please contact me if you have any questions or require additional information.

Sincerely,

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