



June 21, 2019

Richard Corey
Executive Officer
California Air Resources Board
1001 I Street
Sacramento, CA 95814

Re: Electric Vehicle Supply Equipment Standards Regulation

Dear Mr. Corey:

Thank you for the opportunity to comment on the proposed Electric Vehicle Supply Equipment (EVSE) Standards Regulation.

A reliable and robust electric vehicle infrastructure network is key to accelerating the adoption of zero-emission vehicles. In accordance with Executive Order B-18-48, California is working to spur the construction and installation of 250,000 electric vehicle chargers by 2025. We currently only have 20,600 public chargers so we have an urgent need to increase the quantity of chargers. The state must ensure chargers are deployed with consumer protections and universal accessibility in order to benefit all Californians.

Sierra Club California supported Senate Bill 454 (2013) in the legislature, which created the Electric Vehicle Charging Stations Open Access Act. We thank staff for developing the standards to meet the specifications under SB 454. This regulation is an important model for other states seeking to deploy charging infrastructure that is accessible, convenient and has transparent pricing.

As California ramps up its charging infrastructure, it can do more to make EV charging as reliable as filling up at a gas station. While charging station locations may be marked on online maps, the chargers can still be challenging to find. More signage is needed to improve visibility and reduce “range anxiety”. Installing credit card readers on charging stations is another way to improve the charging experience. If a charger doesn’t have a credit card reader, users must either obtain a membership card in advance or download the charging company’s mobile app. This means the user must have a smartphone, sufficient cell coverage and ample data. Deploying chargers with credit card readers is critical to help ensure universal access. That said, it’s important to implement this policy in a way that considers existing investment and uses state funds as efficiently as possible.

We urge CARB to adopt the EVSE standards. Californians want a state in which all residents can anticipate clean air days every day, and where we can reduce climate pollution from internal combustion engines. Developing reliable and easy-to-use charging infrastructure is fundamental to accelerating the transition to zero-emission vehicles in California.

Sincerely,

A handwritten signature in blue ink that reads "Katherine Garcia". The script is cursive and fluid, with the first name and last name clearly distinguishable.

Katherine Garcia
Policy Advocate & Communications Associate