



February 24, 2022

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

RE: EVSE Standards Technology Review

Dear California Air Resources Board Members:

I am writing on behalf of SemaConnect in support of the Air Resources Board's recently released EVSE Standards Technology Review (February 2022).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. At present, SemaConnect is in the top two of smart networked EV charging system manufacturers in the North American market. 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. While EV charging stations currently are concentrated in areas with high EV adoption, charging infrastructure must become widely available to ensure that drivers are not inconvenienced when needing to recharge their vehicles. Furthermore, with charging stations being deployed in greater numbers, drivers will need a range of payment options to improve their familiarity with what may be, from their perspective, a new technology.

Although contactless card payment and other payment methods, such as mobile phone apps, are becoming more common, we acknowledge that access to tap-enabled credit cards and tap-enabled smartphones is not yet universal.² The Air Resources Board EVSE Standards Technology Review (February 2022) notes that "[...] lower-income drivers may have less access to tap-enabled cards and tap-enabled smartphones than higher-income drivers at this time."³ Also, a 2017 report from the U.S. Federal Reserve observed that 26% of all American adults "are either unbanked or underbanked."⁴ On balance, the marketplace will continue to

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

² "Biden admin has \$7.5B to spend on EV charging. How can it get it right?", By Jeff St. John, Canary Media, January 27, 2022: "Expanding access to EV charging isn't just about where the chargers are located, added Leslie Aguayo, climate equity program manager for The Greenlining Institute. It's also important to allow drivers to use multiple forms of payment, including prepaid cash cards, instead of limiting use to customers who've signed up for subscriptions with individual charging networks."

<https://www.canarymedia.com/articles/ev-charging/biden-admin-has-7-5b-to-spend-on-ev-charging-how-can-it-get-it-right>

³ CARB EVSE Technology Review (February 2022), p. 3.

⁴ <https://www.federalreserve.gov/publications/files/2016-report-economic-well-being-us-households-201705.pdf>



evolve, and we concur with the finding of the Technology Review that ongoing monitoring of new payment technologies 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,

Matthew E. Chen
Director, Government Policy & Programs
SemaConnect