

September 19, 2019

Mary D. Nichols, Chair
California Air Resources Board
1011 I Street, P.O. Box 2415
Sacramento, CA 95814

SUBJECT: Docket EVSE2019 – Modified Electric Vehicle Supply Equipment (EVSE) Standards

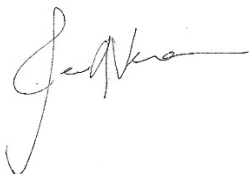
Dear Chair Nichols and Members of the Board,

I write to express the City of Sacramento's support for the modified regulatory language developed in response to comments and Air Resources Board direction. We commend staff's efforts throughout the process. We believe that the revised regulatory language meets the intent of the legislation while balancing the limitations and barriers for public agencies like ours. Specifically, we applaud the revisions to provide a longer compliance timeline for retrofits or replacement of existing infrastructure. We believe the revised compliance timeline of 2033 is appropriate for Direct Current Fast Chargers (DCFC) installed before January 1, 2022, and Level 2 EVSE installed before July 1, 2023. This extended timeline ensures that early public investment in charging infrastructure is not penalized, and that public agencies can continue participating as EV charging operators. With the extended timeline, the City of Sacramento can keep existing infrastructure open while planning and budgeting for future compliance upgrades. This timeline also allows us to take advantage of CALeVIP rebates, since it would not require us to prematurely replace non-compliant CALeVIP infrastructure prior to the end of useful life.

We also appreciate the revisions to allow for aggregated reporting by payment type. However, monitoring may still pose some challenges to local governments. Agencies may use more than one networking company and receive data in different formats. A coordinated approach and partnership with EV network providers will be important to streamline reporting. Any resources local agencies dedicate to reporting, whether staff time or funds for technical support, is public money diverted away from installing new EVSE in our communities. We will monitor and evaluate the impact of reporting on our EV programs, and look forward to collaborating with CARB staff to identify additional opportunities to simplify reporting while providing informative, transparent data.

In conclusion, we support the revised standards. We commend CARB's leadership and look forward to collaborating for attainment of our shared vision of a zero-emission mobility future.

Best regards,



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