

July 26, 2024

California Air Resources Board  
Sustainable Communities and Transportation Division  
1001 I St.  
Sacramento, CA 95814

*Submitted via Comment Log*

## **Re: Proposed Advanced Clean Cars II Vehicle Interoperability Requirements**

Sustainable Communities and Transportation Division Staff:

EVgo welcomes the opportunity to provide comments on the vehicle interoperability requirements proposed as part of the California Air Resources Board's (CARB) amendments to the Advanced Clean Cars II (ACC II) regulation, presented at the June 26 public workshop.

A seamless charging experience is critical to accelerating the mass adoption of electric vehicles (EVs) needed to meet California's decarbonization goals. The proposed amendments to ACC II present an opportunity to further enhance the EV charging experience in California by promoting greater interoperability between vehicles and charging infrastructure.

As one of the nation's largest public fast charging providers<sup>1</sup>, EVgo has led proactive efforts to elevate the customer experience and improve the charging ecosystem. These include the ongoing EVgo ReNew™ program<sup>2</sup> to upgrade and maintain our charging infrastructure, and the publication of best practice guides<sup>3</sup> to improve charger reliability and vehicle interoperability by strengthening industry codes and standards. EVgo is also actively engaged in industry forums including the ChargeX consortium<sup>4</sup>, SAE<sup>5</sup>, and CharIN<sup>6</sup> to collaboratively address the root causes of charging issues.

Drawing on these efforts, EVgo supports CARB's proposal to require Plug & Charge capability for EVs starting in model year 2028 via ISO 15118-2. This proposal will significantly improve convenience and customer experience while aligning requirements for both vehicles and charging infrastructure.

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<sup>1</sup> EVgo has over 1,000 fast charging locations across more than 35 states, including stations built through EVgo eXtend™, its white label service offering.

<sup>2</sup> <https://www.evgo.com/blog/charging-into-the-future-of-range-confidence-with-evgo-renew/>

<sup>3</sup> <https://www.evgo.com/connect-the-watts/>

<sup>4</sup> <https://inl.gov/chargex/>

<sup>5</sup> <https://www.sae.org>

<sup>6</sup> <https://www.charin.global/>

To further strengthen the proposed ZEV Assurance Measures in this rulemaking, EVgo offers the following recommendations to ensure robust conformance testing and enhance both software and hardware interfaces between vehicles and charging infrastructure.

**1. Require Underwriter Laboratories (UL) 2252 certification for adapters and conduct additional stakeholder workshops on adapter standards.**

CARB's ACC II proposal presents an opportunity to address broader issues regarding adapters and adapter safety. Adapters play a crucial role in ensuring a convenient, accessible charging experience for both forthcoming vehicles with a North American Charging Standard (NACS) inlet and legacy CCS vehicles. The increasing availability and use of adapters further underscores the need for robust standards to ensure their safety and reliability, and further oversight by CARB of their proliferation. This may include not only those supplied under the ACC II regulation, but also those sold on third-party online marketplaces.

EVgo has consistently advocated for robust adapter safety standards across both state and federal regulations.<sup>7</sup> Current ACC II regulations require all EVs from model year 2026 onward without a native CCS port to include a CCS adapter tested and approved by a Nationally Recognized Testing Laboratory, but do not specify additional certification requirements.<sup>8</sup> As Underwriters Laboratories (UL) works to finalize standards for adapters under UL 2252, CARB has a timely opportunity to align its adapter requirements with evolving consumer needs.<sup>9</sup>

EVgo encourages CARB to closely monitor UL's progress in developing these standards and to consider requiring UL 2252 certification for all adapters provided under ACC II regulations. Provision of reliable adapters helps ensure EV drivers of NACS-capable EVs will still be able to access the thousands of CCS fast chargers across California that the EV charging industry and the State have invested in to spur EV adoption.

**2. Establish a clear, comprehensive conformance testing framework.**

EVgo encourages CARB to establish a robust and comprehensive conformance testing framework to promote uniform implementation of ISO 15118-2 across all vehicles. This can include guidance on critical functionalities, core use cases to prioritize, and clear benchmarks to ensure a seamless charging experience.

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<sup>7</sup> In [comments](#) to FHWA, EVgo has recommended that all adapters supplied or funded under federal programs be UL 2252 certified, and encouraged regulators to work with industry stakeholders and online retailers to ensure these safety standards extend to all adapters sold to EV drivers.

<sup>8</sup> <https://ww2.arb.ca.gov/sites/default/files/barcu/regact/2022/accii/2aciiifro1962.3.pdf>

<sup>9</sup> <https://efiling.energy.ca.gov/GetDocument.aspx?tn=252421&DocumentContentId=87420> ; [https://shopulstandards.com/ProductDetail.aspx?productId=UL2252\\_1\\_O\\_20230728&ShowFreeviewModal=1](https://shopulstandards.com/ProductDetail.aspx?productId=UL2252_1_O_20230728&ShowFreeviewModal=1)

While developing a conformance testing strategy, EVgo recommends that CARB work closely with industry stakeholders, including charging network operators, automakers, and relevant standards organizations to evaluate potential testing methodologies and certification processes. A key goal of this process should be promoting greater adherence to standards to improve interoperability and the charging experience.

EVgo appreciates CARB's efforts to establish new vehicle interoperability requirements in ACC II. By addressing both software and hardware aspects of vehicle-to-charger communication, CARB can ensure a seamless and reliable charging experience for all EV drivers in California. EVgo looks forward to continued engagement in this rulemaking and remains committed to supporting CARB's goals for widespread EV adoption.

Respectfully submitted,

Romic Aevaz  
Associate, Market Development and Public Policy  
EVgo Services, LLC  
11835 W. Olympic Blvd., Suite 900E  
Los Angeles, CA 90064  
Tel: 310.954.2900  
E-mail: [Romic.aevaz@evgo.com](mailto:Romic.aevaz@evgo.com)