

July 17, 2026

California Air Resources Board
1001 I Street
Sacramento, CA 95814

Re: Drive Forward Light-duty Vehicle Program - June 2026 Workshop

Dear California Air Resources Board (“ARB” or the “Board”) and Staff,

The Electric Vehicle Charging Association (EVCA) appreciates the opportunity to provide comments in response to the Board’s potential updates to the Drive Forward Light-duty Vehicle Program presented at the second public workshop held on June 22, 2026). EVCA is a Sacramento-based nonprofit trade association representing 18 member companies active in the electric vehicle (EV) charging industry, including charging network operators, equipment manufacturers, and technology providers.

EVCA respectfully provides recommendations regarding the preliminary proposals on convenience cords and adapter safety requirements to be taken into consideration in the rulemaking process.

Remove Level 2 Capable Convenience Cord Requirement

The preliminary proposal for ZEV0 Bin Requirements would require a minimum dual-amperage (Level 1/Level 2) capable charging cord. EVCA recommends removing this requirement because Level 2 charging needs vary significantly by driver, vehicle, parking arrangement, and home electrical configuration.

Automakers, dealers, charging providers, and local electrical contractors are best positioned to help drivers identify charging solutions that meet their individual needs. In our experience designing and delivering these solutions to customers, there are a variety of driver needs and preferences related to Level 2 charging equipment. This variability makes Level 2 charging equipment better suited as an after-market or add-on product, allowing drivers to assess the trade-offs of price, function, and quality to select the right option for them. Allowing EV drivers to match their charging preferences with the appropriate solution for their unique electrical system would also reduce total costs for drivers. A standardized Level 2 convenience cord is unlikely to meet the full range of driver preferences and may result in underutilized equipment being included with vehicles by default.

Driver considerations when selecting their preferred equipment include:

- **Amperage:** Level 2 home charging equipment may deliver as much as 80 amps. Drivers with range anxiety, long commutes, or a desire to futureproof will opt to purchase charging equipment to maximize charging speed.

- **Wall-mounting and cable management:** Parking layouts and garage constraints may lead drivers to prefer longer cables, wall-mounted units, or integrated cable management features to minimize cable wear and tear. These functions may be particularly valuable for homes with small garages, shared parking areas, and parking areas with space constraints.
- **Hardwiring:** For outdoor or exposed parking locations, drivers may prefer hardwired equipment because it is fixed in place and can reduce theft risk relative to portable cords.
- **Plug type:** There are several receptacle types that can support Level 1 and 2 charging, most commonly NEMA 14-50 and NEMA 6-50. In the situation that a driver has existing access to such a receptacle, they would select equipment to match it. It would be impractical and highly costly for standard convenience cords to provide a cable to match every receptacle type to meet every possible combination. Drivers expect to purchase the equipment that matches their available receptacle.
- **Data monitoring, remote charge management, and vehicle-grid integration:** Drivers may purchase WiFi-enabled L2 chargers with advanced functionality to track home charging data, including cost, energy used, and distance traveled. Drivers may also use their charging equipment to schedule charging times, remotely override pre-set charging times, and remotely start or end sessions as needed, especially to respond to TOU rates or utility programs that lower the cost of refueling an EV. Advanced vehicle-grid integration (VGI) strategies, such as dynamic load ramping, would generally not be possible on receptacles using basic cables.

Require Rapid UL 2252 Certification for All Vehicle-Provided Adapters

Adapters play a critical interim role in the charging experience amid the transition to SAE J3400, or the North American Charging Standard (NACS), as both CCS and J3400 vehicles continue to coexist in the marketplace. While adapters can expand charging access and support interoperability during this transition, they also introduce safety and reliability risks if not designed, tested, and certified to rigorous standards. In particular, non-UL 2252-certified adapters pose significant safety risks, including overheating, arcing, and damage to the vehicle or the charging infrastructure.

EVCA recommends that CARB require UL 2252 certification for all vehicle adapters, regardless of vehicle inlet type. The safety risks associated with non-certified adapters are not limited to a particular connector configuration or vehicle population. Limiting certification requirements only to adapters associated with non-J3400 vehicles would provide consumers with inconsistent safety protections. A uniform certification requirement for all vehicle-supplied adapters establishes a clear, technology-neutral safety baseline for consumers, automakers, and charging providers.

Additionally, the increasing availability and use of adapters today to access chargers across different connector types highlight the need for robust adapter safety and reliability standards before MY 2031. The preliminary proposal would delay UL 2252 certification until MY 2031, postponing meaningful consumer protections beyond the period when adapter reliance is likely to be highest. Moreover, EVgo and Electrify America, two major EV charging service providers, already restrict adapter use on their networks to UL 2252-certified adapters today. Accordingly, CARB should establish an earlier compliance date for UL 2252 certification for all vehicle-provided adapters well before MY 2031 to improve consumer safety, send a clear and consistent signal to consumers, automakers, and charging providers, and support a more reliable transition to a standardized charging ecosystem.

We thank you for your consideration of these comments and look forward to further engaging on the Drive Forward Light-duty Vehicle Program.

Sincerely,

Reed Addis
Government Affairs
Electric Vehicle Charging Association