July 17, 2026

California Air Resources Board
1001 I Street
Sacramento, California 95814

RE: Drive Forward Light-Duty Vehicle Program – June 2026 Workshop

Dear California Air Resources Board and Staff:

Electrify America appreciates the opportunity to comment on the California Air Resources Board's (CARB) workshop on the Drive Forward Light-Duty Vehicle Program held on June 22, 2026.

About Electrify America

Electrify America is one of the nation's largest open Hyper-Fast network of DC fast chargers (DCFC) for electric vehicles (EVs), with over 1,450 chargers across more than 290 locations open to the public in California as of Q2 2026. In 2025, Electrify America saw significant growth, with over 20 million charging sessions and surpassing 750 gigawatt hours (GWh) dispensed on our national network – a 21% increase over the prior year.

Require UL 2252 and J3400/1 Certification for All Vehicle Provided Adapters Expeditiously

As the market transitions to the SAE J3400 (NACS) standard, adapters serve as a critical bridge while CCS and J3400 vehicles coexist. While these tools expand charging access and improve interoperability, they also introduce distinct safety and reliability risks if they lack rigorous design, testing, and certification. Specifically, adapters without UL 2252 or SAE J3400/1 certification present severe hazards, including overheating, electrical arcing, and physical damage to both vehicles and charging infrastructure.

To ensure uniform consumer safety, Electrify America urges CARB to require both UL 2252 and SAE J3400/1, as applicable, certification for all vehicle-supplied adapters, regardless of inlet type. Uncertified adapters pose safety risks across all connector configurations and vehicle segments. Exempting certain models, such as J3400 vehicles, would result in inconsistent public protection. A universal standard creates a fair, technology-neutral safety baseline for the entire EV ecosystem—including drivers, OEMs, and charging networks.

The surging use of adapters to bridge different connector types underscores the immediate need for robust safety standards long before Model Year (MY) 2031. The current proposal delays UL 2252 certification until MY 2031, stalling critical consumer protections during the exact period when adapter reliance will peak. **Consequently, CARB should consider an earlier compliance deadline to protect consumers, provide regulatory certainty to the EV industry, and secure a reliable transition to a standardized ecosystem.**

Plug and Charge Standard by 2031 – 15118-2

With regards to 15118-2 requirements and a proposed mandate, Electrify America would suggest that CARB consider this only as a hardware-capable proposal. Flexibility between 15118-2 and 15118-20 is paramount for industry as we continue to adapt and evolve with changes in software technology and meeting the auto manufacturers where they are, individually. It is also important to allow for software flexibility to ensure that we can adapt to driver needs in order to continually enhance the driver experience when charging. Some of this flexibility will also be needed in relation to the idea of conformance testing.

In some instances, companies may have made enhancements to improve the standard and the actual customer experience. One such example was the ability in the past to extend charge start timeouts beyond a standard value to improve the driver experience, which should not be seen as a failed test case. Formal third-party testing for conformance does not allow for flexibility or innovative solutions aimed at a greater driver experience and should, therefore, not be considered by CARB at this time as it could unintentionally create an inferior Plug and Charge ecosystem.

Ultimately, CARB should work closely with the California Energy Commission (CEC) on matters related to plug and charge to ensure that the vehicle requirements do not get ahead of or contradict what the CEC or the charging industry are working toward. Collaboration between all stakeholders and state agencies will be particularly crucial to ensuring the plug and charge experience we all seek for drivers.

Conclusion

Thank you for your consideration of our comments. We look forward to continued collaboration with CARB throughout this process as we all work to achieve California's clean transportation goals.

Michael Daft



Government Affairs and Public Policy Lead, Western US
Electrify America