My thoughts after the 9/8/2021, EVSE Rules Making Stakeholder Meeting 1

I am an owner of one of the used EVs like you mentioned in the meeting. In July 2020, I bought my 2015 Chevy Spark EV LT2 with 29,000 miles on it for about $8,500, tax free because of the Washington State incentive. I still own another gasoline powered SUV for long distances or larger loads but rarely need it. Buying and owning the EV is an easy, inexpensive experience and it has been my favorite vehicle I’ve owned. That being said, I see the current public charging infrastructure model to be far behind what’s needed to be prepared for a mass adoption of electric vehicles.

I think there needs to be careful differentiation for the future roles of Level 2 versus Level 3 DC Fast Charging. In the meeting, I sensed hesitancy from the EVSE providers about maintaining the gas station model. I agree that EV charging cannot functionally be the same as gas stations, but I do think there are aspects of gas stations that should be maintained. I envision the future of EV charging to be a combination of the Parking Meter model and what I call the Truck Stop Model.

As mass adoption of electric vehicles evolves, I see for-fee Level 2 chargers will be primarily used where people come from long distances and spend a few hours. For example, sporting events, zoos, park and rides. They will also be used by residents of apartments and condos for personal use. They will not be used where people do not come from long distances or are not spending more than an hour of time, such as grocery stores and shopping centers because nobody wants to pay for a few minutes of charging. As EV range increases there is little incentive for someone to pay for an hour or less of charging when they can just charge at their home location. I already see many abandoned level 2 chargers outside of pharmacies or banks in my area. I view level 2 charging will be less influential toward mass adoption of electric vehicles and should not receive as much consideration. The Parking Meter model is most appropriate for Level 2 chargers.

I view the Truck Stop model as the most beneficial use of Level 3 fast charging. By this, I envision EV charging service stations every 30 to 50 miles along interstate highways or near large populations. These stations would serve as charging islands to support long distance EV travel. These charging islands could have some shopping/food and a greens space for people to spend an hour our less while the vehicle charges.

Having a dependable and enjoyable fast charging experience will lead to faster mass adoption of electric vehicles. It will also help to expand the market of affordable electric personal transportation options by opening up the low-range, low-cost electric vehicle market. Tackling the problem of getting people long distances via electric will also do the most good toward reducing vehicle emissions. The more people who feel confident traveling long distances via electric, the more EV miles driven. I believe focusing on Level 3 infrastructure and rules will have a greater impact toward wide-scale adoption.

Because I view the Level 3 charging infrastructure as the bigger driver of future EV use, I feel that it is reasonable to require level 3 charging suppliers to comply with Section 5; (e, i, f, g) by requiring future level 3 chargers to be only operated at staffed service stations.

Based on my personal experience using publicly available Level 3 fast chargers, the current model of self-serve, unstaffed fast charging will not meet the needs and expectations of current drivers and thus lead to slower transition to electric vehicles.
1. Many self-serve chargers require either an account, app, or both to work. Currently, this works because many EV owners are an esoteric group of technology-literate users, however I believe most people will find these requirements frustrating. To the new EV owner, they will not want to be surprised that they cannot pay because they don’t have the app or required account. By requiring Level 3 chargers to be located at staffed locations, immediate assistance and alternative payment methods will be available.

2. From my experience, there have been numerous times when I have arrived at a charger only to find some or all of the chargers are not operating, or the screen is frozen and needs restarted, the screen is sun-damaged/impossible to read, or the charge connector is too sensitive and does not lock properly to initiate a charge. Requiring level 3 chargers to be at staffed locations will reduce down-time of fast charging stations and increase user confidence and range.

3. Requiring Level 3 chargers to be staffed will achieve the multiple language requirement because an employee can provide assistance, whether or not the employee or customer speaks English.

4. Current Level 3 DC chargers can be heavy and more difficult to use than gas pumps. Though not in the scope of this rules setting, requiring level 3 chargers to be staffed will aid with future rules regarding accessibility.

I understand that requiring level 3 charging to be at staffed locations will not be the easiest or most economical from a service provider standpoint. However, I think it’s important to really think about the best way to get the most people into EVs as quickly as possible and avoid entrenchment from models that may not work for many future EV drivers.

Thank you for reading my comments,

John Mauger