

Andrew S. Johnston
Executive Secretary
Public Service Commission of Maryland
6 Saint Paul Street, 16th Floor
Baltimore, Maryland 21202

Re: Case No. 9478 - Public Conference 44 Electric Vehicle Work Group Supplemental Reliability Summary Report

Dear Mr. Johnston,

My name is David Eugene Waybright. I have never submitted a comment in the past. I hope I'm following all guidelines to do so and if not, I apologize ahead of time!

This topic hits home for me as a member of the EV community since 2018 when I could take my 100-mile range 2013 Toyota RAV4 EV almost anywhere in Maryland or Delaware including ocean city thanks to the vast charging network Royal Farms installed and others like EVgo.

In the beginning of my EV ownership there were issues with reliability but not nearly as bad as it is today. As it was a new market, I also considered it taking one for the team as EVs and charging networks got better.

As more EVs have hit the road there has been increasing issues with reliability of EV chargers. Sadly, EV chargers are installed in 1 or 2 unit installs in most places which leads close to single points of failure in most instances. Some sites are even down for days, weeks, or even months. This is unacceptable! EV Chargers should be held to the same expected reliability as gas/diesel fuel pumps. The biggest problem with this comparison is most gas stations have at least 6 or more fuel pumps and when one goes down it's not felt by Internal Combustion Engine cars because they have a few more at that site to choose from. Also, most fuel pumps are repair in a week or less.

EV owners suffer a much worse fate. When an EV owner goes to a charging station to charge their car to continue their trip, they never know what to expect. This effect is softened by community driven apps like Plugshare where EV owners comment on reliability of stations, but this is not the full solution. Not all EV owners use such apps and either drive to where they know stations are or use the GPS to find one similar to how they find a fuel station.

ICE drivers do not have to worry rather the gas station or pump will be broken on the way there, but EV drivers do. If they don't, there is a big possibility they will get stranded at that charging station with the worst-case scenario of being towed to another nearby (HOPEFULLY) working station.

The worst-case scenario is already a reality with the once plentiful EV network installed by Royal Farms now being completely 100% shutdown with no concern of the EV drivers who relied on it daily! At the time EV adoption is expanding at an unexpected rate companies should not be allowed to just shut down entire networks.

Most if not all EV chargers in MD at the moment have been installed in corridor areas for the purpose of getting from point A to point B. This not only effects MD EV drivers but also non-MD EV drivers either visiting MD or passing thru. Most EV drivers are very aware that chargers have been and are still being funded with government funds so unreliable or shuttered stations are not only looking bad on the charger brand, charging network, property owner, EVs as a whole, but also looking bad on the state for not having reliability be a key part of the requirements for getting the government funds so as not to let these funds go to waste on installs that clearly are just a cash grab that will not be maintained. Maryland's government & taxpayers as well as all EV Drivers should not be disrespected in this way.

A few nonhelpful reliability stats have been seen charger operators in past meetings with the public commission. reliability should not be based on a percentage of up time of any one charger at a site. Some sites are DCFC fast chargers only, some are Level 2 slower chargers only, and others are mixed DCFC and Level 2. If a mixed site has 2 DCFC and 6 Level 2 and both DCFC are down at random times thru the month, but all Level 2 are up the entire month this gives a false percentage when reported as just a site reliability. Chargers that stop communicating or have unknown status should never be assumed working and should always be assumed non-functional.

We need to start having better reliability reporting and this reporting needs to be a part of how new and existing EV charging operators get the government funds as we move forward. Charger sites need to be switched from the useless % stats and need to move to number of failures and the length of each failure, per station not site, from first report to final resolution. This "First Report" should never be one single source, this should be the first report from all sources including but not limited to charging network own internal network wide reporting systems, apps, call centers, emails; Charging operators apps, call centers, emails, etc. This "Final Resolution" should never be a simple "repair - no test" or "repair - less then min test" instead it should be "repair - successful verified first charge from customer of over 2 mins or more". We need detailed reporting.

With the surge of new EVs and new EV drivers there are more EVs on Maryland roads and the time is now to fix the reliability of the charging infrastructure in Maryland. Other states like California have started making reliability a key component to charging network deployment and so should Maryland. By Maryland not insisting on the charging operators to have a reliable network this is impacting the government, taxpayers, and businesses.

With Maryland having several destinations in state that out of state EV drivers would go to as well as new destinations like Great Wolf Lodge coming in the near future and EVs on a steady incline this will start to hurt these destinations and businesses around them if EV drivers feel they need to avoid Maryland and its destinations or bypass Maryland on road trips all together.

Please I urge you and the state to hold EV Charger operators and networks accountable for a reliable charging network and good detailed reliability stats per charging device not site.

I have attached signatures from a petition I started last year of several people who

want these charging companies to be held to high reliability.

I have also attached a few photos of chargers broken throughout Maryland.