

July 12, 2023

National Conference on Weights and Measures  
Specifications and Tolerances Committee  
Jason Glass, Chair  
1135 M Street, Suite 110  
Lincoln, NE 68508

Re: EVF-23.6

To the Specifications and Tolerances Committee:

ChargePoint appreciates the opportunity to provide these comments regarding Item EVF-23.6, to amend section 3.40 of Handbook 44. Item EVF-23.6 was assigned voting status at the interim meeting of the National Conference on Weights and Measures (NCWM). ChargePoint does not support Item EVF-23.6 in its current form but could support the item with the clarification discussed below.

ChargePoint has been an active participant in the Electric Vehicle Fueling Equipment Subgroup (EVFE Subgroup). ChargePoint has previously provided feedback through the EVFE Subgroup regarding Item EVF-23.6, expressing concerns that the notice contemplated in section S.5.2.1 should be allowed to be displayed digitally through the indicating element of the charging stations.

Our understanding through discussions in the EVFE Subgroup was that the original intent of the item was to allow for the option to either display the notice via a physical marking or digital display of the notice through the indicating element of the charging station and the flexibility was intended to be communicated in the item through the omission of the word "indelibly" from S.5.2.1.

However, during discussions of Item EVF-23.6 at the March 2<sup>nd</sup> and 6<sup>th</sup> meetings of the EVFE Subgroup it was discussed that this flexibility is not clear within the item as drafted and could be interpreted to preclude digital display of the notice. Due to this ambiguity ChargePoint has serious concerns with the item as drafted. Requiring retrofitting of stations to physically display the S.5.2.1 notice – and physically remove the notices when no longer applicable - would prove onerous to charging providers and their site hosts, especially those providers like ChargePoint that primarily do not own and operate their charging stations.

As this notice is intended to be temporary - and is not necessary to have on a permanent marking – digital display of the notice through the charging stations is the most effective way to communicate this information to consumers. This would provide station operators and site hosts the option to simply provide the notice digitally through a software update that could then be removed when the notice no longer applies to the charging site.



Accordingly, ChargePoint submits the following proposal to modify section S.5.2.1 of Item 23.6 to provide clarity to inspectors and charging providers, with the recommended changes marked as underlined:

**This marking shall be conspicuously and legibly displayed in a position plainly visible to a person accessing a charging port of the EVSE. The indicating element may be used to display this notice, provided the notice is presented to the customer prior to the beginning of the transaction.**

ChargePoint notes that the Central Weights and Measures Association recently supported this modification at its annual meeting, recommending that EVF-23.6 remain as a voting item with this modification.<sup>1</sup>

To address the concerns outlined above, and in accordance with the CWMA's recommendation from its annual meeting, ChargePoint respectfully requests that the item be modified as requested and remain on the NCWM Annual Meeting agenda as a voting item.

Sincerely,

Jared Ballew  
ChargePoint, Inc.

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<sup>1</sup> See CWMA S&T Annual Meeting Final Report, pp. 371-372.