

January 17, 2025

DMS Notice
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TO: WEIGHTS AND MEASURES OFFICIALS

SUBJECT: EVFS Factory RSA Guidance

The law and associated regulation are not explicitly prescriptive as to when a commercial device is tested for accuracy. We at the Division of Measurement Standards (DMS) have determined that in-factory testing and certification for metrological requirements (device accuracy tolerances) of an Electric Vehicle Fueling System (EVFS) by a factory Registered Service Agency (RSA) may be used to comply with the tolerance testing requirement prior to placing an EVFS into service.

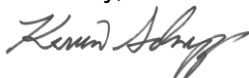
This allowance does not and will not eliminate the need for placing a device in service by an RSA or sealer, but it can reduce the time and resource constraints associated with the current on-site testing utilizing a certified and traceable field standard for device accuracy tolerance verification. A device placed in service must be “correct” and this means that all type approval conditions are met, the device conforms to all adopted specifications and tolerances as adopted, and meets all user requirements (UR). The only way to verify user requirements is at the point of installation and these requirements cannot be “factory certified.”

To address the RSA resource constraints in the near term, DMS will allow for a two-tiered approach with permissive factory RSA testing and certification for metrological tolerances with a final placing into service by an RSA or Sealer at the point of installation and activation with issuance of a placed in service report that includes the factory certification data for the device and a placed-in-service checklist from the RSA verifying UR and other outstanding requirements that cannot be verified in the factory. The field RSAs who use a factory RSA certificate of testing will need a letter from the factory RSA indicating that the field RSA has access to certified standards through a working agreement with the manufacturer who is an RSA.

The identified in-factory RSA testing and certification combined with a field RSA verification of user requirements will alleviate a major infrastructure constraint identified by manufacturers and owners/operators of newly installed EVFS. Factory RSAs shall meet the requirements for having certified and traceable measurement standards in order to test and certify device accuracy tolerances at the point of manufacture.

If you have any questions, please contact Kevin Schnepf at kevin.schnepf@cdfa.ca.gov or contact the DMS office at (916) 229-3000.

Sincerely,



Kevin Schnepf
Director

cc: Hyrum Eastman, County/State Liaison, CDFA

