

## Frequently Asked Questions

### Registered Service Agency (RSA) and Service Agent requirements for commercial AC electric vehicle supply equipment (EVSE\*)

(Revised 3-12-2021)

1. Where can I find the requirements for installing EVSE for commercial use?

The Department adopts by reference, with some additions and exceptions, National Institute of Standards and Technology (NIST) Handbook 44. For further information please visit: <http://www.cdfa.ca.gov/dms/publications.html>

Effective January 1, 2021 all new installations of AC (EVSE) for commercial purposes must conform to the specifications, tolerances, and other requirements as adopted by the Department and published in the California Code of Regulations (CCR) Title 4, Division 9. The Department made some amendments to the specifications and tolerances as published in NIST Handbook 44. To review CCR requirements that differ from NIST Handbook 44 please visit: [https://www.cdfa.ca.gov/dms/pdfs/CA\\_EVSE\\_Regulation\\_Reference\\_Document.pdf](https://www.cdfa.ca.gov/dms/pdfs/CA_EVSE_Regulation_Reference_Document.pdf)

\*Note: The terms -electric vehicle fueling systems (EVFS) and electric vehicle supply equipment (EVSE) are synonymous terms and the regulation applies when either are installed for commercial purposes.

2. What does “Placed in Service” mean?

Placed in service means to activate a device for commercial purposes after it has been tested and found to be “correct” (meaning that the device meets all the tolerance and specification requirements for that device).

3. What is “commercial purpose?”

Commercial purpose is defined in California Business and Professions Code (BPC) Division 5, Chapter 5, Section 12500 (e) “Commercial purposes’ include the determination of the weight, measure, or count of any commodity or thing that is sold on the basis of weight, measure, or count; or the determination of the weight, measure, or count of any commodity or thing upon which determination a charge for service is based.”

Commercial purpose, as defined, is independent of location of the device.

4. Who may place commercial EVSE into service?

Newly installed commercial AC EVSE can only be placed into service by the state or a county Sealer of Weights and Measures or a Registered Service Agency (RSA). A device which has not been “placed in service” by a Sealer an RSA cannot be used commercially.

5. What is an EVSE RSA?

All entities and/or individuals who install, repair, calibrate or adjust commercial EVSE and then place the device into service.

6. Who must be a EVSE RSA?

Any individual or company who, for hire installs, repairs, calibrates and places into service commercial EVSE must be registered with the Department as a Service Agency.

7. Can an individual or business be an RSA if they do not have the appropriate testing apparatus?

Owning test standard(s) is not a requirement if an RSA can demonstrate that they have access to appropriate test standards for testing, verifying the commercial EVSE is correct, and placing it into service.

8. What tests are required?

All tests requirements are detailed in the Examination Procedures Outline (EPO) 52 produced and published on the Department’s, Division of Measurement Standards’ Device Enforcement Program website as the [Device Enforcement Manual](#). EPO-52 is specific to electric vehicle supply equipment. -EPO 52 includes step-by-step instructions to:

- a) Verify that the device has a type approval certificate and the device conforms to the type approval certificate.
- b) Verify that the device meets all specifications, tolerances, and technical requirements applicable to the device as adopted by the Department in regulation.

9. What testing equipment is needed to be an EVSE RSA?

Owning or having access to equipment configured to measure AC electrical power from an EVSE at the vehicle connector (plug) that has a current laboratory certification for electrical measurement with ISO 17025 traceability.

You must ensure that the field standard capacity and type of voltage matches that of the EVSE under test. The test standards must be traceable to NIST or other National Measurement Institute signatory of International Committee of Weights and Measures (CIPM) Mutual Recognition Arrangement (MRA) for accuracy and correctness.

This equipment must also be able to:

- a) Determine the Maximum Deliverable Amperage (MDA) of the device being tested.
- b) Draw a load of not less than 85% of the MDA for a delivery of at least twice the marked Minimum Measured Quantity (MMQ) as specified by the manufacturer.
- c) Draw a load of not more than 10% of the MDA for a delivery of at least the marked MMQ as specified by the manufacturer.

10. How many testing units must an EVSE RSA have per licensed agent working for the RSA?

There is no strict ratio for the number of test standards per number of licensed agents for an EVSE RSA to own or have access to. However, there should be reasonable access to test standards to support the quantity and location of EVSE being placed into service and the number of licensed agents working for an RSA.

11. Does claiming access to a county's testing equipment or other RSA's testing equipment satisfy the minimum standards requirement to be a Registered Service Agency?

Yes. RSA applicants who demonstrate access to appropriate test standards for testing, verifying correct, and placing commercial EVSE into service are eligible for registration by the Department.

12. Some electric vehicle service providers (EVSP) want all their partners to be an RSA or be licensed as a service agent. Can an individual or entity be an RSA specifically if they do not have the testing apparatus?

No. Entities without appropriate test standards or demonstrated access to appropriate test standards may not place commercial EVSE into service.

13. Does the EVSP business model affect who needs to be an RSA?

Yes, it can, depending on who can configure the device and place it into service.

- a) If the device is calibrated and sealed at the factory, and the installer cannot configure, calibrate, or make any metrological adjustment, then the EVSP who places the device into service must be an RSA.
- b) If the installer has the capability to configure, calibrate or make any metrological adjustment to the device, then the installer must be an RSA or licensed service agent associated with an RSA.

14. Can the EVSP be the only RSA if the devices being placed into service are tested by them prior to installation even if the EVSP may never visit the physical location?

Yes, only if the device is tested with traceable standards, found to be correct, and sealed prior to installation and not able to be modified, calibrated, or configured by the installer.

15. Prior to any weighing or measuring device being placed in service, the device must [be type approved](#). Does the DMS Notice [D – 21 - 02R](#) allow an RSA to install non-type approved devices to be used commercially?

Yes. Until July 1, 2021, EVSE that are undergoing but have not yet received [type approval](#) may be installed and used commercially. Once type approval is issued, all devices from that manufacturer must meet the requirements as indicated on the certificate of approval.

16. Do AC EVSE installed between Jan 1, 2021 and July 1, 2021 need to be replaced in July?

Not necessarily, it depends on the design and function of the installed device.

- a) If the device meets the regulatory requirements and conforms to its [Certificate of Approval](#), it does not need to be replaced.

- b) If the device does not meet the regulatory requirements or conform to the Certificate of Approval issued to the device manufacturer, then it must be replaced with a device that does conform.