

**California Department of Food and Agriculture (CDFA)
Division of Measurement Standards (DMS)
Frequently Asked Questions (FAQ)**

**Registered Service Agency (RSA) and Service Agent
Requirements for
Electric Vehicle Fueling Systems (EVFS) / Electric Vehicle Supply Equipment
(EVSE) Used for Commercial Purposes**

(Revised 3/23)

Introduction

An FAQ with general information regarding RSA registration and licensing requirements is available on the Division of Measurement Standards RSA webpage:

<https://www.cdfa.ca.gov/dms/programs/rsa/rsa.html>

Effective January 1, 2023, all new installations of both Alternating Current (AC) and Direct Current (DC) Electrical Vehicle Fueling Systems (EVFS) / Electric Vehicle Supply Equipment (EVSE) used 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).

Electric vehicle chargers are known as Electric Vehicle Fueling Systems (EVFS) and Electric Vehicle Supply Equipment (EVSE). These terms are used synonymously, and the regulations apply for both terms.

1. Where can I find the specifications and tolerances that apply to EVFS/EVSE used for commercial purposes?

The specifications and tolerances that apply to EVFS/EVSE used for commercial purposes are in California Code of Regulations (CCR) Title 4, Division 9, Ch. 1, Article 1, (3.40) Electric Vehicle Fueling Systems. This code section can be found in Chapter 1, Part 3 of the Field Reference Manual (FRM) on the Division of Measurement Standards Publications page: [CDFA - DMS - Publications](#).

2. What does “Placed in Service” mean?

“Placed in Service” means to permit the use of a device that has been tested and found to be “correct” (meaning that the device meets all of the specification and tolerance requirements) as defined in subdivision [\(c\) of Section 12500](#), and type approved, as provided for in [Section 12500.5](#). [Code Reference: [Business and Professions Code \(BPC\) Section 12531 \(d\)](#).]

3. What does “commercial purpose” mean?

“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. [[Code Reference: BPC Division 5, Chapter 5, Code Section 12500 \(e\)](#)] In essence, “commercial purposes” includes any transaction based upon weight, measure, or count.

4. Who may place an EVFS/EVSE into commercial service?

EVFS/EVSEs to be used for commercial purposes may only be placed into service by the State or county Sealer of Weights and Measures or a Registered Service Agency (RSA). [[Code Reference: BPC Division 5, Chapter 5.5, Section 12532\(d\)](#)]

5. Who must be a Registered Service Agency (RSA)?

A person, as defined in [BPC Section 12011](#), that for hire, award, commission, or any other payment of any kind, repairs a commercial device is required to be a service agency.

The term “repair,” in any of its variant forms, means to provide maintenance, or to install, adjust, recondition, or service a device. [[BPC Section 12531\(f\)](#)]

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

Owning a test standard is not a requirement, *provided* the RSA can demonstrate that they have access to suitable, traceable, and sufficient test equipment, and knowledge of the testing procedures and processes for placing an EVFS/EVSE into service.

7. What tests are required?

EVFS/EVSE test requirements are provided in detail in Examination Procedures Outline (EPO) 52. [EPO-52](#) is specific to EVFS/EVSE testing and includes step-by-step instructions to verify that the device has type approval and meets all applicable specifications, tolerances, and other technical requirements.

Accuracy test conditions include:

- a) Determining the Maximum Deliverable Amperage (MDA) of the device being tested;
- b) Testing 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; and
- c) Test a load of not more than 10% of the MDA for a delivery of at least the marked MMQ as specified by the manufacturer.

For Direct Current (DC) systems, it is anticipated that an electric vehicle may be used as the test load. Under that circumstance, testing at the load presented by the vehicle

shall be sufficient.

8. What testing equipment is needed to be an EVFS/EVSE RSA?

The field test standard must be able to measure AC and/or DC electrical power from the EVFS/EVSE at the vehicle connector plug. The test standard must be traceable to the National Institute of Standards and Technology (NIST) or an ISO/IEC 17025 accredited laboratory. The service agent must assure that the field standard specifications meet the specifications of the EVFS/EVSE under test.

9. How many testing units must the RSA have per licensed agent working under that agency?

There is no required number of test standards per number of licensed agents; however, there must be reasonable access to suitable, traceable, and sufficient testing equipment to support the quantity and location of EVFS/EVSE being placed into service.

10. Does access to a county weights and measures jurisdiction's testing equipment or another RSA's testing equipment satisfy the minimum standards requirement to be a Registered Service Agency?

Yes; however, RSAs must provide proof of their access to suitable, traceable, and sufficient test equipment, and their knowledge of the testing and placement into service procedures.

11. Some electric vehicle service providers (EVSP) want all of their partners to be an RSA or be licensed as a service agent. Can an individual or entity be an RSA without the appropriate test equipment?

No. Entities without appropriate test standards or demonstrated access to appropriate test standards may not provide services for commercial EVFS/EVSE.

12. Does this EVSP business model affect who needs to be an RSA?

Depending on the scenario, the RSA responsibility can change:

- a) If the device is calibrated and sealed at the factory, and the installer cannot configure, calibrate, or make any metrological adjustments, then the *EVSP* placing 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.

13. 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 is not present at the physical location?

Yes; however, only if the device is tested with suitable, traceable, and sufficient standards, found to be correct, and sealed prior to installation. The device must not be modified, calibrated, or configured by the installer.

14. Prior to any weighing or measuring device being placed in service, the device must have type approval certification. May an RSA install non-type approved EVFS/EVSE to be used for commercial purposes?

Yes, *provided* the EVFS/EVSE is undergoing type evaluation and has been issued a Temporary Use Permit- it may be installed and used for commercial purposes. Once type approval is complete and a device is fully certified, all devices of that type must meet the requirements as indicated on the National Conference on Weights and Measures (NCWM), National Type Evaluation Program, Certificate of Conformance (NTEP CC) or California Type Evaluation Program, Certificate of Approval (CTEP COA).

15. Do DC EVFS/EVSE installed with a Temporary Use Permit (TUP) on or after January 1, 2023, need to be replaced when the TUP issued by CDFA expires?

Not necessarily, it depends on the performance of the installed device.

- a) If the device meets the regulatory requirements and conforms to the applicable tolerances when device type approval testing is complete, then the device will be issued an NTEP Certificate of Conformance (CC) or CTEP Certificate of Approval (COA) and will not need to be replaced.
- b) If the device does not meet the regulatory requirements or conform to the tolerances applicable to the device type, then it must be replaced with a device that does conform to the current regulatory requirements and has been issued either an NTEP CC or a CTEP COA.