



CALIFORNIA DEPARTMENT OF
FOOD & AGRICULTURE

**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 7/24)

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>

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.

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).

Questions and Answers:

1. 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 a service agency as defined by [BPC Section 12531\(a\)](#) and is required to register with CDFA-DMS. [*Code Reference: BPC Division 5, Chapter 5.5., Section 12532(a)*]

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\(f\)](#)]



2. How to become a Registered Service Agency (RSA):

CDFFA-DMS maintains an RSA Portal which is a self-service online system that enables Agencies and Agents to access agency registrations and agent licenses. Service Agencies can register through the RSA portal. Alternatively, a Service Agency can fill out an application and email the completed application to dms@cdfa.ca.gov.

Information and access to the RSA Portal, a PDF copy of the application, and the FAQ identified above which contains further information regarding RSA registration and licensing requirements can be found here:

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

3. 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\(d\)](#)]

4. 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.

5. 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\(d\)](#)]



6. 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, (1.10.) General Code & (3.40.) Electric Vehicle Fueling Systems. These code sections can be found in Chapter 1, Parts 2 & 3 of the Field Reference Manual (FRM) on the Division of Measurement Standards Publications page: [CDFA - DMS - Publications](#).

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, and;
- b) Testing at loads specified in the “Notes” section of the 3.40. Electric Vehicle Fueling Systems Code.

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, as applicable, from the EVFS/EVSE at the vehicle connector plug. The test standard’s measurement of electrical energy must be traceable to the National Institute of Standards and Technology (NIST) or an ISO/IEC 17025 accredited laboratory. The service agent must ensure that the field standard is appropriate for use with the EVFS/EVSE under test.

9. 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.



10. 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.

11. 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.

12. 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.

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

Any person as defined in [BPC Section 12011](#), that for hire, award, commission, or any other payment of any kind, repairs a commercial device is a service agency as defined by [BPC Section 12531\(a\)](#) and is required to register with CDFA-DMS. [Code Reference: [BPC Division 5, Chapter 5.5., Section 12532\(a\)](#)]

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\(f\)](#)]

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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 is not present at the physical location?

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If an EVSE manufacturer who is also an RSA tests, security seals, and affixes their RSA identification label to their units prior to installation and wishes to issue a placed-in-service report upon activation of the device(s); such a manufacturer or EVSP registered as an RSA could do this but would be accepting the responsibility of attesting to the device's conformance to applicable requirements *after* installation based on their pre-installation assessment and test data.

Subsequent inspection and testing which identifies a device placed in service in a manner that does not meet all applicable requirements may result in the RSA license being suspended or not being renewed in addition to other violations being issued per BPC, CCR, and/or county ordinance.

15. 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).

16. 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?

This is a case-by-case situation depending 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.



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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.

Note: If the device manufacturer is making significant progress towards approval, the TUP may be extended on a case-by-case basis.

17. Are there any reporting requirements associated with placing commercial devices into service?

Yes. Each service agency shall notify the county sealer of the repairing or placing in service of any device. The notice shall be in writing, and transmitted to the county sealer within the 24-hour period following the repair, except as provided by [Business and Professions Code Section 12515\(b\)](#). [[California Code of Regulations Title 4, Division 9, Chapter 4, Section 4085\(a\)\(2\)](#)]

An example report template can be found here:
<https://www.cdfa.ca.gov/dms/programs/rsa/rsa.html>.