



## HOUSE BILL 7 – ELECTRIC VEHICLE RECHARGING EQUIPMENT REBATE PROGRAM - RENEWAL

### FAVORABLE w/AMENDMENT

#### HOUSE ENVIRONMENT AND TRANSPORTATION COMMITTEE

February 1, 2023

NRG Energy, Inc. (“NRG”) submits these comments in **support with amendment of HB 7 – Electric Vehicle Recharging Equipment Rebate Program - Renewal.**

NRG is the leading integrated energy and home services company powered by its customer-focused strategy, strong balance sheet, and comprehensive sustainability framework. A Fortune 200 company, NRG brings the power of energy to millions of North American customers. Our family of brands help people, organizations and businesses achieve their goals by leveraging decades of market expertise to deliver tailored solutions. Our retail brands serve more than six million customers across North America, including here in Maryland, where NRG owns seven companies that are licensed by the Public Service Commission to serve retail customers.

NRG is committed to sustainability and relies on the innovative solutions borne from competitive markets that enable us to meet our goals. NRG has committed to reduce carbon emissions 50% by 2025 and to be net-zero by 2050. That’s using 2014 as a baseline and it’s a goal we are well on the way to achieving. Not only is sustainability a corporate goal, but we are also committed to helping our customers meet their sustainability goals. Our sustainable energy products and services range from renewable energy (including rooftop solar, storage systems, community solar, and electric vehicle charging), to certified carbon offsets, to energy resilience and back-up power solutions, to demand-side solutions including time-of-use plans and demand response programs, and sustainability concierge and advisory services.

NRG supports HB 7 because it expands the rebate program that enables consumers to overcome one of the financial hurdles to investing in electric vehicles and the associated recharging equipment that will keep them fueled. That said, based on our experience working directly with customers, we believe the Rebate Program could be significantly improved by addressing another hurdle that stands in the way of consumers taking advantage of these incentives – simplifying the rebate application process.

We have found that the paperwork required to be completed by a customer to obtain these rebates is often confusing and difficult for them to complete and submit. Moreover, the rebates are delivered weeks or months after the purchase of the equipment, requiring the customer to finance the full cost of the equipment up front – a burden that many customers are unable or unwilling to carry. For that reason, we urge the committee to amend HB 7 to allow the Maryland Energy Administration to create a mechanism for a customer to transfer or assign the

rebate to a third party at the point of sale of the qualified charging equipment, so that the third party can complete the necessary paperwork and deliver the rebate to the customer with an upfront reduction to the cost of the charging equipment. Enabling third parties to finance those rebates by taking on the burden of the paperwork and providing the customer with the full value of that rebate at the same time they are making the decision to purchase the equipment will facilitate EV adoption and help Maryland meet its carbon reduction goals more quickly.

Thank you for the opportunity to share our perspective on HB 7 and with the amendments we have proposed, NRG urges the Committee to give it a **favorable** report.

#### Proposed Amendments

##### Amendment 1:

Page 3, line 11, strike "PARAGRAPH" and replace with "PARAGRAPHS" and after "(2)", insert "(3)".

##### Amendment 2:

Page 3, line 18 after "COMMUNITIES." Insert:

"(3) THE ADMINISTRATION MAY ALTER THE PROGRAM TO ENABLE AN INDIVIDUAL TO TRANSFER OR ASSIGN THE REBATE TO A QUALIFIED THIRD PARTY WHO WILL DELIVER THE FULL VALUE OF THE REBATE TO THE CUSTOMER AT THE POINT OF SALE OF THE RECHARGING EQUIPMENT."

##### Amendment 3:

Page 3, line 30, after "COMMUNITIES." Insert:

(iv) REQUIREMENTS FOR TRANSFER OR ASSIGNMENT OF THE REBATE TO A QUALIFIED THIRD PARTY WHO WILL DELIVER THE FULL VALUE OF THE REBATE TO THE CUSTOMER AT THE POINT OF SALE OF THE RECHARGING EQUIPMENT.

#### **NRG Energy, Inc. Contact Information**

**Sarah Battisti**, Director Government Affairs, NRG Energy, Inc., 804 Carnegie Center, Princeton, NJ 08540, 717-418-7290, [sarah.battisti@nrg.com](mailto:sarah.battisti@nrg.com)

**John Fiastro**, Fiastro Consulting, Inc., 1606 Broadway Road, Lutherville, MD 21093, 443-416-3842, [john@fiastroconsulting.com](mailto:john@fiastroconsulting.com)

**Brett Lininger**, Kress Hammen Government Affairs, 204 Duke of Gloucester, Annapolis, MD 21401, [brett@kresshammen.com](mailto:brett@kresshammen.com)