



March 8, 2024

The Hon. Brian J. Feldman  
Chair, Education, Energy & The Environment Committee  
Senate of Maryland  
Miller Senate Office Building, 2 West Wing  
11 Bladen St.  
Annapolis, MD 21401 - 1991

**Re: Written Testimony to Oppose SB 951 (2024)**

Dear Chair Feldman, Vice Chair Kagan, and Members of the Committee:

Blink Charging Company respectfully opposes Senate Bill 951 on Business Regulation – Electric Vehicle Supply Equipment – Regulations for Retail Use.

**About Blink Charging**

Blink is a global leader in the electric vehicle charging industry, with more than 50 employees working from our production facility and corporate offices in Bowie, Maryland. We have deployed over 1,900 chargers across Maryland and are one of three vendors for the U.S. Postal Service’s nationwide fleet electrification program. Blink’s principal line of products and services includes the Blink EV charging network, charging equipment, and charging services. Next week, Blink will open its new manufacturing facility in Bowie where the company is expanding its production of EV chargers and creating many high-quality jobs in the local community.

**Senate Bill 951**

Senate Bill 951 proposes to require the Comptroller to adopt regulations for the retail use of EV charging supply equipment (EVSE) in Maryland covering a very broad range of categories without fully aligning with the federal government’s minimum standards for the National Electric Vehicle Infrastructure (NEVI) program, which apply to publicly funded chargers. In addition, while the Fiscal Note for SB 951 states that the bill “does not apply to EV supply equipment that is used for noncommercial purposes”, the bill should precisely define these “noncommercial purposes” for EV charging.

Blink Charging Co. appreciates the ongoing dialogue regarding the bill with its sponsor, Senator Hettleman, and is open to engaging a stakeholder process to refine its proposals before the next legislative session. We warmly welcome this opportunity.



## **Policy Context**

Maryland is a leader among the 50 states for its bold goals and ambitious policies to reduce emissions from the transportation sector. However, much remains to be done to ensure that the number of EV charging stations better match demand for electric vehicles themselves. The Maryland Energy Administration's January 2024 study on multifamily EV-ready requirements indicates that "[...] Maryland is already on track to meet the 2025 DCFC forecast. However, significant development of a Level 2 charging network is needed."<sup>i</sup> According to the U.S. Department of Energy's Alternative Fuels Data Center, Maryland has 1,394 public Level 2 charging station locations with 3,638 charging ports and 295 public DC fast charging station locations with 973 DC fast charging EVSE ports.<sup>ii</sup>

Blink Charging Co. recognizes that EV drivers expect public chargers to be widely available, affordable, and reliable. The federal government, through various policy initiatives including but not limited to the National Electric Vehicle Infrastructure (NEVI) program and Charging and Fueling Infrastructure (CFI) grants, is funding both DC fast chargers and Level 2 chargers across the country. These publicly funded chargers must meet minimum standards for uptime, payment options, "information communicated about the availability and functioning of each charging station" and more. Similarly, several other states also are implementing regulations for EV chargers. To ensure that states' regulations and standards for EV charging remain adaptable to rapidly advancing technological and engineering developments, we recommend initially applying them to publicly funded chargers.

If passed into law as introduced, SB 951 could inadvertently slow down the deployment of EV charging infrastructure across Maryland even as the state requires sales of electric vehicles to reach 43% by 2027. At this time, we respectfully request an unfavorable report from the committee.

Sincerely,

Matthew E. Chen  
Director, Government Affairs  
Blink Charging Co.

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<sup>i</sup> Maryland Energy Administration (MEA), Multifamily Residential EV Study, January 2024, page 25  
[https://dlslibrary.state.md.us/publications/Exec/MEA/HB830Ch582\(3\)\(2023\).pdf](https://dlslibrary.state.md.us/publications/Exec/MEA/HB830Ch582(3)(2023).pdf)

<sup>ii</sup> Alternative Fuels Data Center (AFDC), U.S. Department of Energy,  
[https://afdc.energy.gov/fuels/electricity\\_locations.html#/analyze?region=US-MD&fuel=ELEC&ev\\_levels=dc\\_fast](https://afdc.energy.gov/fuels/electricity_locations.html#/analyze?region=US-MD&fuel=ELEC&ev_levels=dc_fast)