

TESTIMONY REGARDING HB 784
being heard by the Maryland House Environment & Transportation Committee
on Tuesday, February 16, 2021 at 1:30 PM

Dear Chair Barve and Members of the Committees:

Thank you for the opportunity to provide input on HB 784, which will increase the deployment of electric vehicle (EV) charging equipment in new home construction. As it is least expensive to install charging equipment or a dedicated electric line to support charging equipment during construction, Tesla supports HB 784 with an amendment that would provide buyers with their choice of charging equipment and allow all Level 2 chargers, and future iterations of the technology, to be eligible.

Tesla's mission is to accelerate the world's transition to sustainable energy through the deployment of electric vehicles and energy storage solutions and solar energy systems. To date, Tesla has delivered more than one million EVs globally. This experience gives us unique insight into what it takes to deploy electric vehicles at volume and which policy mechanisms are most effective in furthering adoption.

Maryland has set an ambitious goal of 300,000 zero emission vehicles (ZEV) on the road by 2025. In order to meet this goal, it is important for the state to develop policies that encourage ZEV adoption, including those that make it easier and less expensive to deploy at home charging equipment. HB 784 is a sensible approach to increase the availability of home charging and will reduce the cost of home charging installation. It is significantly more cost-effective to install an EV charger when the homes are built, rather than retrofitting homes later. Retrofits often require significant electrical work that will well exceed the cost of the actual charger.

We suggest one important amendment to the bill that enables customer choice when it comes to which charger they would like installed in their new home. The current definition of "Level 2 Charging" limits eligible chargers to the SAE J1772 definition which would exclude Tesla level 2 equipment. SAE J1772 requirements include a specific connector geometry that is different than the connector type Tesla uses. Tesla vehicles do come with an adapter to use J1772 stations (and thus can communicate with J1772 protocols), however, homeowners prefer to not have to regularly use and manage adapters, and instead want a Tesla charging station. Below, we propose an alternative definition for "Level 2 Charging" that would ensure that all Level 2 charging products currently on the market and that meet applicable safety standards (UL listing) are eligible. Moreover, the definition also leaves the door open for further innovation on level 2 charging types in the future, such as wireless inductive charging. Once a new technology is commercialized, it should also be eligible so long as it meets applicable safety standards. But the current definition that cites SAE J1772 standards would not allow for that.

Tesla proposes the definition for "Level 2 Charging" be amended as follows:

(4) "LEVEL 2 CHARGING" MEANS A LEVEL 2 ELECTRIC VEHICLE CHARGING LEVEL AS DEFINED BY SAE INTERNATIONAL'S J1772 STANDARD. ELECTRIC VEHICLE SUPPLY EQUIPMENT THAT PROVIDES AN ALTERNATING CURRENT POWER SOURCE AT A MINIMUM OF 208 VOLTS TO AN ELECTRIC VEHICLE AND THAT MEETS APPLICABLE INDUSTRY SAFETY STANDARDS.

Thank you for the opportunity to provide this testimony.

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