

**TESTIMONY REGARDING SB 477**  
**being heard by the Maryland Senate Education, Energy, and the Environment Committee**  
**on Tuesday, February 14, 2023, at 1:00 PM**

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

Thank you for the opportunity to provide input on SB 477, which will increase the deployment of electric vehicle (EV) charging equipment in new home construction and significant home renovation.

Tesla's mission is to accelerate the world's transition to sustainable energy through the deployment of electric vehicles, energy storage, solar energy systems, and charging infrastructure. In 2022, Tesla delivered over 1.3 million EVs globally, accounting for about 65% of all EVs sold in the US market last year.<sup>1</sup> 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 and 600,000 by 2030. 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 charging equipment wherever those vehicles are, whether it be at home, work, or during recreation. SB 477 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 homes are under construction, rather than retrofitting homes later. Retrofits often require significant electrical work that will well exceed the cost of the actual charger<sup>2</sup>.

Tesla supports SB 477 and recommends the below additions and amendments to reduce barriers to EV adoption by providing buyers with access to charging options where needed most, at home and while on the go.

1. In addition to the construction of new housing units and the significant renovation of existing housing units in §12-205 (b)(1)(2), **Tesla recommends the addition of new construction and significant renovation of commercial-designated properties that have more than 50 parking spaces.** Application of this legislation to larger facilities increases access to EV charging options at work, during recreation, and while shopping, without imposing undue burden on small businesses.
2. Under §12-205 (c)(D)(1)(I), relating to multifamily residential buildings with off-street communal parking, SB 477 requires at-least one (1) EVSE-installed space for each 25 residential units—a rate of only 4% EVSE-installed. To ensure that jurisdictions are not under planning for future EV adoption, a baseline of 20% EV-readiness for multifamily parking spaces is recommended. Thus, **Tesla recommends inclusion of at least four (4) parking spaces per 25 units be EV-Ready,**

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<sup>1</sup> <https://www.spglobal.com/mobility/en/research-analysis/new-ev-entries-nibbling-away-at-tesla-ev-share.html>

<sup>2</sup> Minezaki, T, Et al. *Electric Vehicle Infrastructure Cost Analysis Report for Peninsula Clean Energy & Silicon Valley Clean Energy* (Energy Solutions, 2019), 14-16.

**meaning full circuit installations include 208/240V, 40-amp panel capacity, raceway, wiring, receptacle, and overprotection devices, in addition to the EVSE-Installed requirement.**

3. Section 12-205 (c)(D)(2) gives municipalities the authority to pass more inclusive and ambitious EV-readiness requirements for multifamily buildings and townhomes, but does not mention single family homes. **Tesla recommends the inclusion of single-family homes in this section.**

Thank you for the opportunity to provide this testimony.

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