

STATE OF MARYLAND



OFFICE OF THE CHAIRMAN

JASON M. STANEK

PUBLIC SERVICE COMMISSION

March 27, 2023

Chair Brian Feldman
Education, Energy and Environment
2 West, Miller Senate Office Building
Annapolis, Maryland 21401

RE: HB 834 – INFORMATION – Electric Vehicle Charging Infrastructure – Requirements (Electric Vehicle Charging Reliability Act)

Dear Chair Feldman and Committee Members:

I write today to provide information regarding HB 834 – Electric Vehicle Charging Infrastructure – Requirements (Electric Vehicle Charging Reliability Act). HB 834 requires the Commission to expand the current EV Pilot¹ to permit participating electric companies to install EV charging stations in multifamily dwellings in underserved communities. Many of the utility pilot programs are currently scheduled to end in December 2023, although some programs will conclude in 2025. HB 834, as amended, allows for the deployment of additional utility-owned charging stations at multifamily dwellings, subject to reasonable cost limitations balanced with the public interest. This expansion is further limited to installing Level 2 EV charging stations and will terminate on December 31, 2025. These provisions align HB 834 with the existing EV Pilot Program and will help the utilities control their costs, consistent with the Commission’s statutory mandate to maintain just and reasonable rates. HB 834 will also increase utility costs for distribution system-related work and upgrades. These costs will be passed through to the ratepayers.

HB 834 also sets a reliability or average uptime requirement of 97 percent for all utility-owned and operated EV charging stations. On February 15, 2023, the U.S. Departments of Transportation and Energy finalized new EV charging reliability standards similarly requiring a 97 percent average annual uptime for publicly accessible charging stations funded under the National Electric Vehicle Infrastructure (“NEVI”) Formula Program. In anticipation of this federal rule, the Commission issued an order in January, directing the Commission’s EV work group to submit finalized reliability standards once the NEVI standards were released. HB 834’s uptime requirement will align utility EV charger reliability with federal and Commission

¹ PSC Case Docket No. 9478.

standards, which will ultimately lead to cost savings as the utilities procure EV charging equipment that meets national standards.

As amended, HB 834 requires the participating electric companies to maintain an adequate number of staff to maintain the 97 percent uptime requirement for their charging networks. If a utility fails in this regard, the utility will be required to submit a corrective action plan for achieving compliance with the law. The bill further authorizes the Commission to pursue additional remediation measures, including financial and/or operational remedies. This is consistent with the Commission's existing oversight authority to ensure that utilities deliver safe, reliable, and affordable services and programs that meet statutory standards and goals.

I appreciate the opportunity to provide information on HB 834. Please contact Lisa Smith, Director of Legislative Affairs, at (410) 336-6288 if you have any questions.

Sincerely,



Jason M. Stanek
Chairman