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March 6, 2024

The Honorable C. T. Wilson  
Chair, House Economic Matters Committee  
231 House Office Building  
Annapolis MD 21401

***RE: Letter of Information w Amendments – House Bill 1028 – Business Regulation –  
Electric Vehicle Supply Equipment – Regulations for Retail Use***

Dear Chair Wilson and Committee Members:

The Maryland Department of Transportation (MDOT) offers the following information on House Bill 1028 for the Committee’s consideration.

House Bill 1028 would require the Comptroller to adopt regulations for the retail use of electric vehicle supply equipment (EVSE). The bill details nineteen provisions the regulations shall address, including payment options for customers, ‘uptime’ requirements, hours of operation, training and certification requirements for individuals who install or maintain EVSE, and penalties for non-compliance. The regulations must comply with the Federal Highway Administration (FHWA) National Electric Vehicle Infrastructure (NEVI) Formula Program.

The MDOT administers the NEVI Program, which will allocate over \$60 Million for EVSE installations over the next five years. All Electric Vehicle (EV) charging installations funded with NEVI Program funds or any other source of federal funds must comply with federal standards and requirements. House Bill 1028 could create discrepancies between State and federal regulatory requirements. Given the importance of the NEVI Program to EV infrastructure deployment in the State, State regulations should be aligned and/or consistent with all applicable federal regulations. Examples of discrepancies in House Bill 1028 include the definition of training and certification requirements for EVSE installers, minimum power requirements, methodology for measuring ‘uptime,’ and minimum hours of operation.

The MDOT recognizes the need to establish a regulatory framework for the consumer experience with publicly available EV Charging stations. Vehicle electrification has emerged as a key imperative in the nation’s response to threats from climate change, and the need to reduce greenhouse gas (GHG) emissions. A regulatory framework is needed to ensure predictability in the consumer market and with technology developments by vehicle and equipment manufacturers. The MDOT has jurisdiction and responsibility for deployment of federal funding through the NEVI Program and other federal funds, and for ensuring compliance with federal standards and requirements affecting EVSE deployment. The MDOT thanks the bill sponsor for working on amendments to ensure MDOT’s inclusion in the bill.

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The Maryland Department of Transportation respectfully requests the Committee consider this information when deliberating House Bill 1028.

Respectfully submitted,

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