**BaltimoreCounty_FAV_HB1028.pdf**
Uploaded by: John Olszewski
Position: FAV

JOHN A. OLSZEWSKI, JR.
*County Executive*

JENNIFER AIOSA
*Director of Government Affairs*

AMANDA KONTZ CARR
*Legislative Officer*

WILLIAM J. THORNE
*Legislative Associate*

BILL NO.: **HB 1028**

TITLE: Business Regulation – Electric Vehicle Supply Equipment – Regulations for Retail Use

SPONSOR: Delegate Allen

COMMITTEE: Ways and Means

POSITION: **SUPPORT**

DATE: March 6, 2024

Baltimore County **SUPPORTS** HB 1028 – Business Regulation – Electric Vehicle Supply Equipment – Regulations for Retail Use.

This legislation will require the Comptroller to adopt regulations for the retail use of electric vehicle supply equipment in the State. The regulations will establish different payment options for the retail use of EV supply equipment including options for customers with disabilities. HB 1028 will prohibit an EV service provider from requiring a subscription or membership fees to initiate a charging session. Furthermore, the legislation would establish requirements for information sharing including charging rates, locations, accessibility, and real-time availability, among other accessibility and consumer-friendly reforms.

Baltimore County has found a lack of clarity and consistency between jurisdictions regarding ADA/disability access to EVSE and supports the requirement of options for those in need of ADA standards who are also EV drivers. This legislation has several key elements to enhance and facilitate access to EVSE for consumers while requiring comprehensive information to be reported by service providers. Charging the growing number of EVs in use requires a robust network for stations for both consumers and fleets, and industry standards and certifications to ensure high quality infrastructure will serve Baltimore County well in its goal to support EV adoption.

Accordingly, Baltimore County requests a **FAVORABLE** report on HB 1028 from the House Ways and Means Committee. For more information, please contact Jenn Aiosa, Director of Government Affairs at jaiosa@baltimorecountymd.gov.

# HB1028 Breiner Testimony EMC Biz Reg EVSE Regulati

Uploaded by: Joyce Breiner

Position: FAV

Testimony to the House Economic Matters Committee
HB 1028 Business Regulation – Electric Vehicle Supply Equipment – Regulations for Retail Use
**Position: Favorable**

March 4, 2024

The Honorable C. T. Wilson, Chair
Room 231, House Office Building, Annapolis, MD 21401

Honorable Chair Wilson and Members of the House Economic Matters Committee:

I and my family have been an Electric Vehicle (EV) family since 2011 having experience with five EV makes/models. For over a decade I have been a part of and observing EV adoption in Maryland and across the United States. I have also spent untold hours educating groups and individuals about EVs. The vast majority of charging is done at home but in 2022 we spread our wings to do more road trips.

On the occasions I use EV public charging, I need to be able to count on it being up and running just as a fossil fueled car owner expects the pump to work. Why should Maryland's current and future EV owning citizens and those visiting our state expect anything less?

Just prior to the Covid shutdown, I attended a national gathering of EV enthusiasts where I met Kyle Conner, an earnest, positive messaging YouTuber (over 211,000 subscribers on his Out Of Spec Reviews channel) who first got my attention for his instructional videos about roadtripping in electric vehicles. Over the years, he has crisscrossed the country too many times to count in all kinds of EVs under all kind of conditions.

During the December 2022 holiday season Kyle posted commentary on the state of public EV Charging expressing grave concern about reliability issues in his video titled, "Unwrapping the Christmas Week From Hell for EV Drivers using CCS" (96,000 views). The whole video is informative, especially for non-EV drivers/owners, and does a deep dive into the state of charging in the US which is much the same today *using CCS*. Key though is the wrap-up at the end which especially instructive: "...there was not one person we met, probably 50 different people charging at public [CCS] Chargers this trip [Colorado to Florida] and there was not one person that enjoyed their experience charging that we met...". In another more recent video he makes the comment, "When it comes to charging networks, there's Tesla and then there's everybody else", driving home the observed superior reliability of the Tesla charging network over all the others. I could not agree more with this sentiment. That system continues to improve with dynamic real-time information about the charging location and state of the chargers available to the driver before arrival. This network needs to be a template for all others.

Reliability cannot be established without data collection and accountability cannot be required without plans to improve under established metrics. HB 1028 accomplishes this.

Thank you for your consideration, and I urge a favorable report on HB 1028.

Respectfully,

Joyce K. Breiner, CC-P®

**HB1028_FAV_Hartmann.pdf**
Uploaded by: Lanny Hartmann
Position: FAV

Plug-In Sites
EV charging from a driver's perspective.

March 6, 2024

**Favorable - HB 1028 — Business Regulation – Electric Vehicle Supply Equipment – Regulations for Retail Use**

Mr. Chairman,

As an avid electric vehicle (EV) driver who frequently uses public charging stations, I am writing to support HB 1028, Business Regulation – Electric Vehicle Supply Equipment – Regulations for Retail Use.

Millions of public dollars have been invested in building EV charging infrastructure across Maryland to encourage residents to choose EVs. Yet, achieving this goal hinges on the reliability, affordability, and convenience of charging stations. Holding recipients of public funds accountable for both functionality and user experience is crucial.

A recent study by RateYourCharge[1] revealed a stark disparity in charger reliability. While Tesla excelled with a low 0.6% failed check-in rate, other providers displayed an alarming 13% failure rate, potentially leaving drivers stranded. Such inconsistencies are unacceptable and hinder EV adoption.

In an effort to contribute to solutions, I personally tested nearly 70 high-speed chargers in Maryland during August 2022. Disappointingly, only 71% functioned properly, with the remainder experiencing various issues like error messages, damaged connectors, and reduced power output. I reported these findings to the Maryland PSC to raise awareness of the issue.[2]

HB 1028 will establish uniform standards for EV charging providers in Maryland. This helps ensure consistent reliability and user experience. It will also foster confidence among potential EV owners. By eliminating concerns about unpredictable functionality, this legislation will significantly accelerate the transition to cleaner transportation in our state.

Thank you for considering my testimony. I urge a favorable report on HB 1028 and support this crucial step towards making electric vehicles a more viable option in Maryland.

Sincerely,

Lanny Hartmann
PlugInSites.org
Columbia, Maryland

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[1] RateYourCharge - 2023 Year End Report http://bit.ly/48AjSkc

[2] PSC Case No. 9478 - Lanny Hartmann Comments. (ML 242263)

**HB 1028 - Lynn Parsons - Favorable.pdf**
Uploaded by: Lynn Parsons
Position: FAV

Testimony to the House Ways and Means Committee
HB 1024 Business Regulation – Electric Vehicle Supply Equipment – Regulations for Retail Use
**Position: Favorable**

March 4, 2024

The Honorable Vanessa Atterbeary
House Office Building
Annapolis, MD 21401

Honorable Chair Atterbeary and Members of the House Ways and Means Committee:

As the driver of a 2015 Nissan Leaf that is now beyond 112,000 miles I am especially qualified to comment on the implications of this bill. My Leaf at purchase was occasionally capable of 100-mile range in the beginning but now on a good day I can count on about 60-70. This means I rely HEAVILY on the availability of public charging.

As the EV adoption continues to grow, more and more individuals that I encounter at the charging station are relying on public charging as their sole source to recharge their battery. Contention for chargers is increasing and it is no longer unusual to have to wait for access to a charger. In my experience the chargers are increasingly not being maintained in operable condition and this increases contention for the remaining operable chargers. This past year was notably worse for me than previous years with regard to inoperable charging stations and had a negative impact on family and friends and their impressions of EV driving experience.

What are the implications of poor maintenance to the EV driver? Lost time calling the service provider to find out if they can initiate a charge, lost time searching for the next nearest charger and depending on how far this is, lost time requesting a tow if battery capacity fails to reach that destination. It could mean missed doctors' appointments, job interviews, soccer games etc. It can have a very detrimental impact on the life of the driver and friends and family. I have experienced these losses and they are painful. I have seen how some drivers take their frustration out on the equipment and this exacerbates the problem adding to the expense of the repair.

This bill not only will hopefully provide the accountability and thereby service providers will be obligated to provide reliable service of their chargers. It will also provide you with useful data that can be used for wise planning and legislation. Because EVs are a relatively new mode of transportation planners have lacked the real-life experience there were misconceptions and misguided projections about how EV charging would be utilized. Battery charging is wildly different from gas refueling and undeniably there are installations which could have been done much better had there been experience as a guide. The needs will change over time with increased adoption and evolving technology. With this bill, you, and Maryland residents gain valuable information about usage, cost, quality of equipment and trends.

Thank you for your consideration, and I urge a favorable report on HB 1024.

Respectfully,

Lynn Parsons
Kensington, MD

**czajka_hb1028_030424_FAV.pdf**
Uploaded by: Mark Czajka
Position: FAV

# Subject: HB 1028– SUPPORT

March 4, 2024

Delegate C.T. Wilson
Chair, House Economic Matters Committee
House Office Building – Room 231
Annapolis, MD 21401

Dear Delegate C.T. Wilson and Members of the Committee:

My name is Mark Czajka and I'm a resident of Charles County and the Director of MD Volt Inc., a Maryland EV club. I **SUPPORT** House Bill 1028 (Business Regulation – Electric Vehicle Supply Equipment – Regulations for Retail Use). These are my personal views.

**EV charging station reliability has been so bad nationwide that major auto manufacturers have opted to support Tesla's NACs standard.** Just last week an adapter was released for Ford vehicles; Lightning and Mach E owners are rejoicing as they can now use the more reliable Tesla network of Superchargers. If we can make reliability transparent and accountable, it will go a long way to improving uptime of non-Tesla charging networks. **We want to provide a positive experience to keep people buying all makes and models of EVs.**

Codifying uptime is important. 3% downtime is 11 days per year, which seems reasonable to prevent if spare parts are maintained. Accountability could also allow utilities to evaluate the hardware/software decisions and purchases they made, and influence future expansion of their networks. For example, if hardware is constantly going down, the manufacturer or installers should be audited for performance. If downtime is related to vandalism on a reoccurring basis, then security should be considered.

If you have any questions, please feel free to contact me at mark@mdvolt.org.

Sincerely,

Mark Czajka
Waldorf, MD 20603

**HB1028 Electric Vehicle Charging Reliability Act.p**
Uploaded by: Robert Borkowski
Position: FAV

Testimony to the House Economic Matters Committee
HB1028 Business Regulation – Electric Vehicle Supply Equipment – Regulations for Retail Use
**Position: Favorable**

March 4, 2024

The Honorable C.T. Wilson, Chair
Room 231, House Office Building, Annapolis, MD 21401

Mr. Chairman,

I am writing in support of HB1028, the Electric Vehicle Supply Equipment – Regulations for Retail Use.

Entities receiving taxpayer or ratepayer funds to increased install and operate electric vehicle ("EV") charging infrastructure should be held to accountability and transparency requirements.

HB1028 will hold entities the same reporting requirements as private entities participating in the federal National Electric Vehicle Infrastructure ("NEVI") program.

In 2019, the Public Service Commission's, PSC approved an EV Pilot Program, allowing BGE, Pepco, Potomac Edison and later SMECO ("utilities") to install and operate public charging equipment in Maryland. The program allow these utilities to install Level-2 ("AC Destination Chargers") and Level-3 DCFC ("DC Fast Chargers") chargers.

The program also allows utilities to offer residential and non-residential EVSE ("Electric Vehicle Supply Equipment", aka "EV Charging Station") rebates to incentivize individuals and commercial entities to install EV Chargers.
The General Assembly needs to evaluate the results and determine whether utilities and private entities are sufficiently capable of installing, operating, and maintaining EV charging stations.

HB 1028 requires to provide detailed information regarding their charging infrastructure, also to account for market failures.

Despite realizing financial losses, utilities have consistently praised their ability to install and operate reliable chargers. In their February 2023 semi-annual progress report, utilities have reported financial losses of their 202 out of 217 sites, losing over $400,0001[1]. Utilities operating EVSE sites at a lose are directly competing with private and Multifamily Dwellings by selling electricity (kWh) below open market prices.

During transition to EV adoption and low utilization of the EVSE, utilities have no financial incentive to provide acceptable uptime of minimum 97% especially when the sites loose money.

1 https://webpsc.psc.state.md.us/DMS/case/9478
Potomac Electric Power Company and Delmarva Power & Light Company - Case No. 9478 (ML 301131)
Baltimore Gas and Electric Company - Case No. 9478 (ML 301120)
Southern Maryland Electric Cooperative, Inc. - Case No. 9478 (ML 301119)
The Potomac Edison Company - Case No. 9478. (ML 301116)

Testimony to the House Economic Matters Committee
HB1028 Business Regulation – Electric Vehicle Supply Equipment – Regulations for Retail Use
**Position: Favorable**

Private companies are vital partners in the effort to increase adoption of e-mobility. Utilities and PSC must focus on providing competitive electric tariffs for all EVSE site operators, especially Multifamily Dwellings in Maryland.

DCFC sites are designed for long distance travel, thus the EV Pilot subsidizes out of state travelers. PSC and utilities must focus on EVSE Tariff serving multifamily dwelling Level-2 installations directly serving Maryland residents. Increased penetration of Level-2 EVSEs at multifamily dwellings will indirectly reduce the need for subsidized DCFC sites.

One EV charging at 150 kW DCFC is equivalent to 20 EVs charging on Level-2 EVSE.
One EV charging at 250 kW DCFC is equivalent to 30 EVs charging on Level-2 EVSE.

HB 1028 seeks to increase and specify the data provided regarding the reliability of the EV chargers, so lawmakers can make informed decisions regarding the future role of EVSEs and the cost of electricity operators pay to the utilities.

Recognizing the failure of private industry to place EV charging stations in underserved communities, due to unpredictable and affordable cost of electricity during the transition period of low utilization. PSC's authorized rebate and installation programs to reduce this disparity has had some success compared to the rebate program for multi-unit dwellings. The program does not provide any post installation cost mediation to keep the cost of electricity predictable and affordable to the owners and operators thus subpar reliability results.

HB 1028 will ensure all entities that use public funds to install EV chargers are held to a uniform standard to improve consumer experience and incentivize more drivers to switch to EVs.

HB 1028 will also allow lawmakers to make more informed decisions regarding the role of utilities in promoting EVs moving forward.

Thank you for your consideration, and I urge a favorable report on HB 1028.

Respectfully,

Robert Borkowski

**Wilson HB 1028 FAV.pdf**
Uploaded by: Scott Wilson
Position: FAV

Testimony to the House Economic Matters Committee
HB 1028 Business Regulation – Electric Vehicle Supply Equipment – Regulations for Retail Use
**Position: Favorable**

4 March 2024

The Honorable C.T. Wilson, Chair
Room 231, House Office Building, Annapolis, MD 21401

Honorable Chair Wilson and Members of the House Economic Matters Committee:

My name is Scott Wilson, and I currently drive a 2017 Chevy Bolt EV and a 2013 Nissan Leaf. I serve on the Maryland Zero Emission Electric Vehicle Infrastructure Council, and I'm also Vice President of the Electric Vehicle Association of Greater Washington DC.

It's time for EV charging to start growing up. We stand at the brink of mass EV adoption. This bill would establish sensible regulations, similar to current practice in the gasoline system, that would standardize EV charging for the benefit of Marlynad EV/PHEV drivers.

Gas pumps have requirements for signage, independent inspection and verification, in a system that has evolved over 100 years. While signage requirements for EV chargers might not need to be as stingent due to their dispersed nature, wayfinding needs to work better for drivers without needing to use a phone app. Third-party calibration and inspection are essential. Just as gas pumps undergo accuracy inspections, so too should EV chargers, ensuring they meet their advertised power rating.

Accurate uptime data is crucial for identifying and addressing issues promptly. You can't fix what you can't measure. If a gas pump malfunctioned, how long do you think it would take to get fixed? I reckon not long, and it should be the same for EV chargers. Imagine if a corporate office claimed their gas pumps maintained a 97% uptime rating, yet station after station had one or two pumps that were down for weeks on end. I think we all know how long that would be tolerated.

This bill begins the process of cleaning up EV charging to make it as dependable, reliable and convenient as we've come to expect from gas stations, by putting in place the minimum requirements that reasonable people would expect.

Thank you for your time,

Scott Wilson

**HB 1028 - Letter of Support.docx.pdf**
Uploaded by: Rachel Jones
Position: FWA

Maryland
Department of Agriculture
*Office of the Secretary*
**Wes Moore,** Governor
**Aruna Miller,** Lt. Governor
**Kevin M. Atticks,** Secretary
**Steven A. Connelly,** Deputy Secretary

Agriculture | *Maryland's Leading Industry*
The Wayne A. Cawley, Jr. Building
50 Harry S Truman Parkway
Annapolis, Maryland 21401
mda.maryland.gov
**410.841.5885 Baltimore/Washington**
**410.841.5846 Fax**

**Maryland Department of Agriculture**

**Legislative Comment**

**Date: March 6, 2024**

**BILL NUMBER:** **HB 1028**/SB 951

**SHORT TITLE:** Business Regulation – Electric Vehicle Supply Equipment – Regulations for Retail Use

**MDA POSITION:** FAVORABLE WITH AMENDMENTS

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The Maryland Department of Agriculture (MDA) through its Weights and Measures (W&M) unit regulates and inspects various devices in our State for consumer protection. We follow National Institute of Standards and Technology (NIST) standards for weights and measures devices. Across the U.S., State Departments of Agriculture have W&M divisions tasked with this responsibility.

MDA W&M regulates weighing and measuring devices, instruments, elements, and systems, used or employed in establishing the measurement or in computing any basic charge or payment for services rendered on the basis of weight or measure. Devices that are used in commercial transaction currently regulated by MDA W&M include retail motor fuel devices (gas pumps), bulk motor fuel devices ( fuel trucks and loading racks), liquified petroleum gas meters (vehicle mounted and stationary propane meters), grain moisture meters, small, medium, large capacity scales, vehicle scales, belt conveyor scales, rail scales, and point of sale software.

NIST Handbook 44 Section 3.40. Electric Vehicle Fueling Systems sets the standards for EVFS chargers. This section sets the application, specifications, test procedures, tolerances, and user requirements for EVFS chargers. Since Maryland adopts NIST Handbook 44 by reference in statute, the standards set forth in Section 3.40. are the standards that MDA W&M will enforce.

MDA W&M will inspect and certify EVFS chargers to ensure the device is accurate and correct and will conduct investigations in response to consumer complaints. Registration of the EVFS chargers will be required to offset the costs associated with testing and inspecting these devices. This is addressed in the departmental bill.

Both MDA W&M and the Comptroller of Maryland regulate gas pumps and vehicle tank meters by working together to oversee different aspects, which establishes existing precedent for joint regulation by multiple agencies. W&M is responsible for ensuring the pumps and truck mounted meters are accurate and correct. W&M ensures equity within the marketplace between consumers and businesses and investigates consumer complaints. The Comptroller of Maryland oversees fuel quality and Motor Fuel Tax.

As amended, the bill continues to allow MDA W&M to have jurisdiction on the registration, specifications, tolerances, and user requirements for commercial EVFS chargers. The amendments also give MDA the authority to revoke a registration for a faulty commercial EVFS charging device if it is not repaired in a timely manner. MDA W&M does not intend or desire to regulate electric public utility or EV infrastructure, the PSC is the regulator. The Comptroller will regulate rates or pricing associated with electricity transactions. MDA thanks the Committee for your consideration of a favorable report.

If you have additional questions, please contact Rachel Jones, Director of Government Relations, at Rachel.Jones2@maryland.gov or (410) 841-5886.

**HB1028 Final.pdf**
Uploaded by: Emily Kelly
Position: UNF

March 6, 2024

The Maryland House of Delegates
Economic Matters Committee
Room 231
House Office Building
Annapolis, MD 21401

Dear Chair Wilson and Vice Chair Crosby:

The undersigned electric vehicle charging service providers (EVSPs) appreciate the opportunity to provide comments on HB1028.

We applaud the state of Maryland for their ambitious goals that will support the transition to a cleaner transportation sector. The combination of The Maryland Climate Pollution Reduction Plan goals to achieve 60% climate pollution reductions by 2031 and be on track to net zero emissions by 2045, plus the adoption of Advanced Clean Cars II[1] (ACC II) last year puts Maryland in a position to be a national leader on reducing greenhouse gas emission and advancing the adoption of zero emission vehicles and related charging infrastructure.

However, while well-intentioned**, as drafted, the bill will discourage charger installation growth in Maryland**, and warrants further stakeholder discussion. Because of the myriad of confusing regulatory issues in this bill, including misalignment in instances with the Federal Highway Administration's (FHWA) national technical minimum standards under the National Electric Vehicle Infrastructure (NEVI) Program, we are taking an unfavorable position and request an unfavorable report from the Committee.

According to the Alternative Fuels Data Center, Maryland has just over 1,600 chargers and given the zero emission vehicle goals that the state has committed to, there will be a need for many more chargers to allow drivers to charge at home, work, and on the go. We look forward to working collaboratively in partnership with the state to help Maryland reach its ambitious goals for ZEV adoption and respectfully submit the below comments.

**Regulations for Publicly Funded EV Charging Stations**

We recognize the need for more harmony on technical standards and requirements for state funded electric vehicle service equipment (EVSE) grant programs and encourage the state to consider many different aspects of the regulations in this bill when crafting that program. As an example, grants administered by the Maryland Energy Administration have eligibility requirements, and the federally funded NEVI RFP released in Maryland has specific guidelines on charger power level, location requirements, uptime reporting, payment methods, and other important standards to be followed.

We understand Maryland crafting regulations and guidelines for publicly funded EV charging programs that use taxpayers' dollars. Those standards should be crafted to align with program and state policy goals that will allow for Maryland to meet its ZEV adoption goals, like ACC II, and provide a clear roadmap with opportunities for stakeholder input As an industry, we support increased standardization

[1] https://mde.maryland.gov/programs/air/MobileSources/Pages/Clean-Energy-and-Cars.aspx

of technical requirements and request further opportunities for stakeholder input before such a sweeping bill is to be passed and promulgated.

**HB1028**

HB1028, as drafted, goes well beyond enacting regulations or standards for publicly funded stations and proposes regulations on ALL chargers installed in Maryland starting in January 2025, except for "noncommercial," chargers which are not defined. In addition, there is a provision at the end of the bill that would apply *all* the regulations retroactively to stations already installed in Maryland. It is impractical for every station to be retrofitted to meet the regulations proposed, financially and operationally, risking existing chargers that drivers rely on today being prematurely taken out of service before the end of their useful life. Further, there are major concerns that over prescribing requirements including minimum power levels and requiring certain certifications to install or repair stations, without a robust stakeholder process, could inhibit deployment in the state.

This bill, as drafted, covers 17 different regulations and standards for EV charging in Maryland that would be applied to all stations in the future and retroactively. The regulations range from a minimum power level of chargers installed to various labeling requirements on the stations, to a real time data requirement with no guardrails on private competitively sensitive information, such as utilization, and other unclear language around specific certifications to install and repair chargers. Each of these topics deserves a robust dialogue between the State and the industry to better understand each other's perspectives and capabilities. For example, the State may be interested to know that much of the data outlined in this bill is already provided through various EVSP mobile applications available to drivers along with free, publicly available resources to EV drivers, like the federal Alternative Fuels Data Center[2]. As a result, we believe this bill should not duplicate existing data reporting requirements provided through multiple public platforms. This is only one example pointing out the need for more robust stakeholder engagement.

In conclusion, we thank the Committee for the opportunity to provide these comments on HB1028 and look forward to working with you on ways to support reliable and equitable EV charging for the state through both publicly funded and privately funded stations. The undersigned organizations welcome a robust stakeholder process to set more consistency across charging stations for EV drivers in Maryland, and we are hopeful that the Committee will consider our input before making any final decision on how EV chargers should be designed and deployed in Maryland moving forward. Please do not hesitate to contact us if you have any questions.

Sincerely,

Emily Kelly
Senior Manager, Public Policy
ChargePoint

Anthony Willingham
Gov't Affairs & Public Policy Lead – State Government
Electrify America

Katelyn Lee
Sr. Associate, Market Development & Public Policy
EVgo

[2] https://afdc.energy.gov/stations/#/find/nearest

Daniel Bloom
Public Affairs Manager – US East
FLO

Bill Ehrlich
Staff Policy Advisor
Tesla

**2024 - HB1028 - PHI - LOI.pdf**
Uploaded by: Anne Klase
Position: INFO

March 6, 2024

112 West Street
Annapolis, MD 21401

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

Potomac Electric Power Company (Pepco) and Delmarva Power & Light Company (Delmarva Power) submit this letter of information on **House Bill 1028 - Business Regulation – Electric Vehicle Supply Equipment – Regulations for Retail Use**. House Bill 1028 requires the Comptroller to adopt regulations for the retail use of electric vehicle (EV) supply equipment in the State. The regulations must comply with the Federal Highway Administration's National Electric Vehicle Infrastructure (NEVI) Formula Program and provide a delayed applicability date for EV supply equipment installed before the date the regulations are initially adopted.

Maryland has adopted a goal of 300,000 zero-emission vehicles on the road by 2025 to help achieve statewide greenhouse gas reduction goals. Pepco and Delmarva Power are an active partner in the effort, and we appreciate this bill's intent to ensure consistent reliability standards for publicly available electric vehicle charging stations across Maryland.

The Maryland Zero Emission Electric Vehicle Infrastructure Council (ZEEVIC) is charged with formulating an action plan to successfully integrate EVs into the State's transportation network, among other duties. ZEEVIC and the Maryland Public Service Commission's (PSC) Electric Vehicle Workgroup are actively working on electric vehicle reliability standards and infrastructure challenges. In January, the PSC issued an order to define reliability standards for utility-owned electric vehicle charging stations. Pepco and Delmarva Power submitted a business and reliability plan that addresses those standards. If this legislation were to pass as drafted, the requirement of the Comptroller's Office to adopt additional regulations may usurp the work the ZEEVIC and the PSC are currently undertaking, creating inconsistencies.

Pepco and Delmarva Power are committed to helping Maryland achieve its electric vehicle goals and hope this letter of information is helpful. We look forward to continuing conversations with the bill sponsor and all stakeholders involved.

Contact:
Anne Klase
Senior Manager, State Affairs
240-472-6641
Anne.klase@exeloncorp.com

Katie Lanzarotto
Manager, State Affairs
410-935-3790
Kathryn.lanzarotto@exeloncorp.com

**BGE_ECM_LOI_House Bill 1028- Business Regulation –**
Uploaded by: Dytonia Reed
Position: INFO

bge
AN EXELON COMPANY

Position Statement

Letter of Information
Economic Matters
3/6/2024

**House Bill 1028- Business Regulation – Electric Vehicle Supply Equipment – Regulations for Retail Use**

Baltimore Gas and Electric Company (BGE) offers this letter of information on *House Bill 1028- Business Regulation – Electric Vehicle Supply Equipment – Regulations for Retail Use. House Bill 1028* would require the Comptroller to adopt regulations for the retail use of electric vehicle (EV) supply equipment in the State.

Maryland has adopted a goal of 300,000 zero-emission vehicles on the road by 2025 to help achieve statewide greenhouse gas reduction goals. BGE is an active partner in this effort and appreciates this bill's intent to ensure consistent reliability standards for publicly available electric vehicle charging stations across Maryland.

First, there are ongoing efforts addressing this topic, which *House Bill 1028* needs to consider and, if passed, could delay, or contradict their progress. The Maryland Public Service Commission is actively working with stakeholders on electric vehicle reliability standards[1] to address EVSE infrastructure challenges with Utility-owned chargers. In January, the Commission issued an order to define reliability standards for utility-owned electric vehicle charging stations. In response, BGE submitted a business and reliability plan that addresses those standards. Additionally, this legislation attempts to align with the National Electric Vehicle Infrastructure (NEVI) standards, but not completely. BGE will work with the bill sponsor to ensure there is alignment with Commission standards for utility-owned electric vehicle charging stations. BGE believes it premature to establish standards that are not aligned with federal NEVI and Commission standards.

BGE is committed to helping Maryland achieve its electric vehicle goals.

[1] The Commission issued Order#90971— EV Charging Station Reliability and Reporting Standards. It also issued Order #90984 – EV Demand Charge Relief Program, which also addresses electric vehicles charging stations.



Charles Washington| Brittany Jones | Guy Andes| Dytonia Reed| 410.269.5281

**HB1028 - TSO - EVSE Business Regulation_LOI_FINAL.**

Uploaded by: Nora Corasaniti

Position: INFO

MARYLAND DEPARTMENT OF TRANSPORTATION

Wes Moore
Governor

Aruna Miller
Lieutenant Governor

Paul J. Wiedefeld
Secretary

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.

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

Respectfully submitted,

Pilar Helm
Director of Government Affairs
Maryland Department of Transportation
410-865-1090