

Testimony to the House Environment and Transportation Committee
HB 1225 Weights and Measures - Electric Vehicle Charging Equipment - Registration
Fees

Position: Favorable with Amendment

2 March 2026

The Honorable Marc Korman, Chair
Room 251, House Office Building
Annapolis, MD 21401



Honorable Chair Korman and Members of the House Environment and Transportation Committee:

EV Charger Inspection Program – Focus Resources on Reliability, Not Accuracy

I write in support of the proposed reduction of the per-port inspection fee from \$150 to the per-meter fee charged to a retail motor fuel dispenser meter, currently \$20, supplemented by an appropriation from the Maryland Strategic Energy Investment Fund (SEIF). This fee reduction is a meaningful improvement. However, I urge the committee to go further and restructure the program itself – narrowing its scope to charger operational status (reliability) rather than billing accuracy. As detailed below, accuracy inspection of public EV chargers is technically unnecessary at this stage of the Maryland EV market, and a delay in implementing accuracy inspections is both prudent and warranted.

1. EV Drivers Are Telling Us: Reliability, Not Accuracy, Is the Problem

The Electric Vehicle Association of Greater Washington DC (EVADC) is an educational non-profit chapter of the National Electric Vehicle Association. It comprises 226 active EV drivers with over 10.5 million EV miles driven. A February 2026 poll EVADC conducted produced a clear and consistent finding: public charger reliability – not billing accuracy – is the dominant concern among Maryland-area EV users. The survey drew 24 responses from drivers with an average of 8 years of EV driving experience and an average of approximately 101,000 EV miles driven, making this a technically informed cohort.

Key findings from the poll:

- 96% of respondents were "not very concerned" or "not concerned at all" about billing accuracy at public chargers.
- Only 2 of 24 respondents (8%) reported ever suspecting they were billed inaccurately.
- Not a single respondent rated billing accuracy as their top concern.
- Multiple respondents explicitly called out reliability and availability as the issues that must be addressed first.

Written comments reinforced this view. One respondent with 400,000 EV miles noted that charger reliability at non-Tesla sites "is the biggest issue that needs addressed." Another with 120,000 miles stated: "The #1 issue for me with public charging infrastructure has been reliability. After that, availability. I've never encountered an accuracy issue." A third suggested that a mandatory accuracy fee amounts to "a solution in search of a problem."

2. Why Billing Accuracy Is A Rare Problem: Revenue-Grade Meters and Factory Calibration

Unlike gasoline dispensers — which have moving mechanical parts subject to wear and drift — the vast majority of modern EVSE (Electric Vehicle Supply Equipment) units are manufactured with revenue-grade electricity meters. These meters are calibrated at the factory to meet or exceed ANSI C12.20 accuracy standards (Class 0.2 or better), and their solid-state electronics do not degrade in the way that mechanical fuel dispensers do.

When billing discrepancies do occur at public chargers, the cause is almost never meter inaccuracy. The far more common root cause is improper tariff configuration — an operator setting a per-minute or per-session price incorrectly in software. This is a business administration error, not a metrology problem. It cannot be detected or remedied through physical meter inspection under NIST Handbook 44; it requires auditing the pricing configuration against posted rates.

In short: the inspection framework being proposed to solve a billing accuracy problem is not well-matched to the actual source of billing errors in the field.

3. Maryland Weights and Measures Authority Already Exists — A Delay Is Sufficient

I recognize that the Maryland Department of Agriculture's Weights and Measures division has existing statutory authority to inspect commercial measurement devices, including EVSE, under NIST Handbook 44. That authority is not in question. Accuracy inspections will eventually occur. The question before this committee is one of timing and resource prioritization.

Given that:

- No significant evidence of systematic meter inaccuracy in Maryland's EV charging network has been documented;
- EV drivers themselves do not identify accuracy as a pressing concern;
- The charging infrastructure buildout is still in early stages, and regulatory burdens risk discouraging investment; and
- Weights and Measures staff will need time to develop EVSE-specific testing protocols and acquire appropriate equipment;

...a delay measured in years, not months, before commencing accuracy inspections is a reasonable and well-justified policy choice. This delay would allow the program to launch with operational status inspections — verifying that chargers are actually functioning — while Weights and Measures develops a more mature and targeted accuracy inspection protocol, based on EV driver feedback.

4. Recommended Program Structure

I respectfully urge the committee to adopt the following approach:

- Adopt the \$20/port fee and SEIF appropriation structure as proposed. This is a significant improvement over the original \$150/port fee and reduces the burden on EVSE operators.
- Prioritize operational status inspections in the initial program phase. Inspectors should verify that chargers are powered, communicating, and capable of completing a charge session. This directly addresses the concern EV drivers have actually expressed.
- Delay accuracy (metrology) inspections until driver feedback indicates accuracy becomes an issue. Use this period to gather baseline data, develop protocols appropriate to solid-state EVSE meters, and assess whether field evidence of inaccuracy actually emerges. It has yet to emerge at a scale that warrants action.
- Consider a risk-based accuracy inspection model. Rather than inspecting every port annually, a random sampling approach — as suggested by at least one poll respondent — would allow Weights and Measures to detect systemic problems without imposing blanket costs on an industry that data suggests is not generating billing errors.

Conclusion

Maryland EV drivers are a pragmatic group. They want chargers that work. Survey data, field experience, and the technical characteristics of modern EVSE all point in the same direction: the immediate priority for any inspection program should be reliability — whether a port is operational — not metrological accuracy. The \$20/port fee reduction is a step in the right direction; structuring the program around what EV drivers actually need would make it a genuine success.

Thank you for your consideration.

Respectfully submitted,

Ron Kaltenbaugh, President Electric Vehicle Association of Greater Washington DC