



Memorandum

**To: The Honorable Paul Doyle & The Honorable Lonnie Reed
Co-Chairs Joint Committee on Energy & Technology**

From: Matt Mincieli, Northeast Region Executive Director, TechNet

Date: March 10, 2016

Re: HB 5510, An Act concerning electric, zero emission and fuel cell vehicles

Dear Senator Doyle, Representative Reed and through you to the members of the Energy & Technology Committee, my name is Matt Mincieli, and I am the Northeast Region executive director at TechNet. TechNet is a state and federal policy trade association made up of CEOs and senior executives from more than 70 of the nation's leading technology and innovation companies. On behalf of our membership, we respectfully submit the following testimony in support of, albeit with the inclusion of several vital amendments, HB 5510, An Act concerning electric, zero emission and fuel cell vehicles.

TechNet's member companies have strongly supported legislation across the country to expand access to and expansion of electric vehicle (EV) charging stations, increased consumer incentives to purchase and use EVs and a regulatory landscape that inhibits the growth of EVs and the technology that powers and allows them to innovate to the benefit of the consumer.

While HB 5510 has many good provisions, including Sections 2, 5, 6 and 12, it must be significantly amended or else could negatively impact the expansion of EVs in Connecticut. There are provisions included in the current bill that are confusing, harmful, and conflict with existing laws and regulations.

The following provision is extremely confusing and must be amended:

- **Section 4: Defines EV charging stations and would create time of day rates for EV charging** - Must be amended. This section misleadingly defines "public" charging stations as free public charging stations, and defines "private" charging stations as those that allow access to anyone. This is confusing and inconsistent with how other states define charging stations. These definitions should be removed, and new definitions should be added for the following terms: EV charging station, public EV charging station, and publicly available parking space. Subsection (b) should be amended to require PURA to establish time of day rates for residential and commercial customers. This would decrease the cost of charging an EV at home or charging a commercial fleet of EVs at night, when electric demand is low. These lower costs would be a good incentive for drivers of EVs and operators of commercial EV fleets.

These provisions have potential but must be strengthened:

- **Section 1: Defines different types of ZEVs** - The bill wrongly defines “electric vehicle” (subsection 2) and “zero emission vehicle” (subsection 7) as including regular hybrids (like the traditional Prius) rather than plug-in hybrids. This is inconsistent with standard definitions of EVs and ZEVs and would likely lead to confusion. Moreover, there are strong policy reasons to exclude regular hybrids from these definitions in case they are later used as the basis for state incentive programs. Regular hybrids are well established in Connecticut and elsewhere and no longer need financial or other incentives—in contrast to plug-in hybrids and EVs, which are newer technologies.
- **Section 8: Requirements for EV charging stations** - Subsection (a) concerns payment options, so it should only apply to public EV charging stations that require payment of a fee. Such stations should not be required to offer specific payment options, but should instead offer payment options that allow access by the public. Subsection (b) should be amended to require owners or operators of public EV charging stations to disclose information about the stations to a database. The bill currently requires DMV to do this, but there is no requirement for the information to be reported to DMV. Finally, subsection (e), which prohibits membership-only charging stations, is too broad a prohibition. This language should be changed to allow owners or operators of public EV charging stations to charge separate prices for members and non-members, but require access to be open to all.

These provisions are unnecessary or harmful and should be removed:

- **Section 7: Signage requirements for electricity and hydrogen fuel – conflict with current standards** - Should be deleted. The requirements in this section conflict with national standards from the National Institute of Standards and Technology Handbook 44, which Connecticut has adopted.
- **Section 9: Would discourage EV charging stations by requiring them to pay high fees starting in 2016** - Should be deleted. This section would require EV charging stations to pay an annual registration fee of \$50. This would discourage installation of charging stations, which would limit options for EV drivers.
- **Sections 10 and 11: Would require adoption of standards that have already been adopted** - Should be deleted. These sections are unnecessary because they would require adoption of EV charging standards in the National Institute of Standards and Technology Handbook 44 and Handbook 130, which the Department of Consumer Protection has already adopted.

In closing, we thank you for your attention to our testimony and on behalf of our membership respectively ask that you carefully consider the implications of passing HB 5510 as currently drafted and consider the attached amendments we have proposed. If TechNet or any of our member companies can be of any assistance to you and your Committee as you deliberate this

important legislation, please feel free to consider us a resource and contact us at mmincieli@technet.org.

HB 5510/LCO 2022 Amendments

An Act Concerning Electric, Zero Emission and Fuel Cell Electric Vehicles

H.B. 5510 must be amended. The bill has many good provisions, including Sections 2, 5, 6, and 12, but it also includes provisions that are confusing, unnecessary, harmful, or conflict with existing laws or regulations.

The following provision is extremely confusing and must be amended:

Section 4: Defines EV charging stations and would create time of day rates for EV charging

Must be amended. This section misleadingly defines “public” charging stations as free public charging stations, and defines “private” charging stations as those that allow access to anyone. This is confusing and inconsistent with how other states define charging stations. These definitions should be removed, and new definitions should be added for the following terms: EV charging station, public EV charging station, and publicly available parking space. Subsection (b) should be amended to require PURA to establish time of day rates for residential and commercial customers. This would decrease the cost of charging an EV at home or charging a commercial fleet of EVs at night, when electric demand is low. These lower costs would be a good incentive for drivers of EVs and operators of commercial EV fleets.

These provisions have potential but must be strengthened:

Section 1: Defines different types of ZEVs

The bill wrongly defines “electric vehicle” (subsection 2) and “zero emission vehicle” (subsection 7) as including regular hybrids (like the traditional Prius) rather than plug-in hybrids. This is inconsistent with standard definitions of EVs and ZEVs and would likely lead to confusion. Moreover, there are strong policy reasons to exclude regular hybrids from these definitions in case they are later used as the basis for state incentive programs. Regular hybrids are well established in Connecticut and elsewhere and no longer need financial or other incentives—in contrast to plug-in hybrids and EVs, which are newer technologies.

Section 8: Requirements for EV charging stations

Subsection (a) concerns payment options, so it should only apply to public EV charging stations that require payment of a fee. Such stations should not be required to offer specific payment options, but should instead offer payment options that allow access by the public. Subsection (b) should be amended to require owners or operators of public EV charging stations to disclose information about the stations to a database. The bill currently requires DMV to do this, but there is no requirement for the information to be reported to DMV. Finally, subsection (e), which prohibits membership-only charging stations, is too broad a prohibition. This language should be changed to allow owners or operators of public EV charging stations to charge separate prices for members and non-members, but require access to be open to all.

These provisions are unnecessary or harmful and should be removed:

☒ Section 7: Signage requirements for electricity and hydrogen fuel – conflict with current standards

Should be deleted. The requirements in this section conflict with national standards from the National Institute of Standards and Technology Handbook 44, which Connecticut has adopted.

☒ Section 9: Would discourage EV charging stations by requiring them to pay high fees starting in 2016

Should be deleted. This section would require EV charging stations to pay an annual registration fee of \$50. This would discourage installation of charging stations, which would limit options for EV drivers.

☒ Sections 10 and 11: Would require adoption of standards that have already been adopted

Should be deleted. These sections are unnecessary because they would require adoption of EV charging standards in the National Institute of Standards and Technology Handbook 44 and Handbook 130, which the Department of Consumer Protection has already adopted.

CT EV Coalition Steering Committee: Acadia Center, ChargePoint, CT Fund for the Environment, Environment CT, Sierra Club