

Thomas Weiss
P. O. Box 512
Montpelier, Vermont 05601
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House Committee on Energy and Digital Infrastructure
State House
Montpelier, Vermont

Subject: H.125 reporting on the energy transition.
Electric Vehicle Supply Equipment (charging stations)

Dear Committee:

Representative Sibelia noted in her sponsor's testimony on the 4th that she wants to make sure this bill includes the right metrics and that it supports all our communities. These comments recommend additional metrics for charging stations. A recommended amendment to H.125 is at the end of these comments.

As you discuss charging stations, please keep in mind that they have barriers that prevent some people from getting or using electric vehicles. The barriers mostly are the requirement for a cell phone and that stations are unattended (and do not accept cash or checks.) I suggest additional metrics to gather information on the barriers.

I do not use a plug-in electric vehicle. The last vehicle I had with a plug was decades ago for the headbolt heater. I looked into a plug-in hybrid six years ago. I did not buy one for multiple reasons. One of the reasons was the barriers imposed by charging stations. For these comments, I looked into charging stations again. I found the same barriers.

My survey of five charging stations in Montpelier found that none meets the title 30 definition of charging stations. The survey is of the five charging stations that I pass when doing errands in Montpelier. I use "charging station" as more convenient than the longer "electric vehicle supply equipment".

Provision in the bill

30 V.S.A. §8012 (b) The report shall include:

(3) the number of electric vehicle supply equipment in the State and if there was any change in the number in the prior year;

Legal requirements

The testimony in your committee on charging stations so far has focused on the Agency of Transportation's perspective of charging stations. I point out the definition used in the public service statutes.

30 V.S.A. Chapter 5 (State Policy; Plans; Jurisdiction and Regulatory Authority of Commission and Department 201 Definitions (2) "Electric vehicle supply equipment" means a device or system designed and used specifically to transfer electrical energy to a plug-in electric vehicle as defined in 23 V.S.A. § 4(85), either as charge transferred via a physical or wireless connection, by loading a fully charged battery, or by other means. "Electric vehicle supply equipment available to the public" shall:

(A) be located at a publicly available parking space, which does not include a parking space that is part of or associated with a private residence or a parking space that is reserved for the exclusive use of an individual driver, vehicle, or group of drivers or vehicles including employees, tenants, visitors, residents of a common interest development, residents of an adjacent building, or customers of a business whose primary business is not electric vehicle charging;

(B) disclose all charges for the use of the electric vehicle supply equipment at the point of sale; and

(C) provide multiple payment options that allow access by the public, if a fee is required, and shall not require persons desiring to use such public electric vehicle supply equipment to pay a subscription fee or otherwise obtain a membership in any club, association, or organization as a condition of using such electric vehicle supply equipment, but may have different price schedules that are conditioned on a subscription or membership in a club, association, or organization.

23 V.S.A. Chapter 1 (Motor Vehicles, General Provisions)

§4 Definitions (85) "A 'plug-in electric vehicle' includes both a 'battery electric vehicle' and a 'plug-in hybrid electric vehicle'.

Status of third-party charging stations

I looked at five charging stations in Montpelier that I pass when doing my errands. I found that none of the five meets the definition of "being available to the public".

Here are the findings from my observations.

<u>Location</u>	<u>Brand</u>	<u>(A) publicly available parking space?</u>	<u>(B) disclose charges?</u>	<u>(C) provide multiple payment options?</u>	<u>meet definition?</u>
Governor Aiken Avenue, three chargers	Chargepoint	yes (1st charger) no (2nd and 3rd for legislators)	\$0.26 / kWh	no (smartphone or Chargepoint card; requires membership)	no
behind City Hall	Semaconnect ChargePro	yes (requires regular parking fee)	yes (\$0.22 / kWh + fee of \$0.49)	no (smartphone or Semaconnect RFID card; requires membership)	no
private parking lot at 535 Stonecutters Way	Chargepoint	possibly (a sign in street points to the charging station)	I didn't find any.	no (smartphone; requires membership)	no
Hunger Mountain Co-op	Enphase (level 2)	no (reserved for customers)	no (if one asks one learns it is free)	yes (one merely plugs in and uses it)	no
Parking lot behind Drawing Board on Main Street	flo	yes (metered parking lot, requires regular parking fee)	\$0.35 / kWh + \$10/hr. after 1st hour	no (appears to be credit card only)	no

Barriers to use of third-party charging stations

It appears that current practices at these stations are a barrier to some potential users even acquiring a plug-in electric vehicle.

The stations require users to pull up and get out of their vehicles to learn the rates. Even then, maybe, they can't learn the rates.

The stations are unstaffed and do not accept cash or check. So those who do not have the devices needed for payment cannot use third-party charging stations that require payment.

Each brand of equipment that uses a smartphone, requires use of the brand's own application on the smartphone.

Recommendation

Amend §8102(b)(3e) to show how many of the charging stations meet the definition in the public service statute and how many are merely masquerading as evs without meeting all three conditions. I suggest:

- "(3) (a) the number of electric vehicle supply equipment in the State and if there was any change in the number in the prior year;
- (b) how many of the evse meet all the requirements of 30 V.S.A. §201 (2);
- (c) the nature and number of deficiencies in meeting the requirements of 30 V.S.A. §201 (2);
- (d) whether any of the evse accept cash or checks; and
- (e) whether the different brands accept a common payment application.

I hope that you find these comments useful and that you propose that subdivision (b)(3) be amended as I recommended.

Sincerely,
Thomas Weiss