



Dear Chairman Dempsey,

The undersigned 21 organizations are writing today to request that H.4282, *An Act promoting electric vehicle adoption*, be favorably reported out of the House Committee on Ways and Means as soon as possible.

Increased adoption of zero emission vehicles (ZEVs), including all-electric vehicles, plug-in hybrid vehicles, and hydrogen fuel cell vehicles, provides a tremendous opportunity for the Commonwealth of Massachusetts and its citizens. These vehicles provide significant benefits to drivers by reducing fuel costs, the regional economy from fewer dollars spent on imported oil and more spent in local economies, communities burdened with air pollution, and even electric ratepayers, in addition to increased energy independence and lower greenhouse gas emissions.

We all agree that there is considerable urgency to this effort. As an adopter of California's ZEV program, Massachusetts will require manufacturers to begin offering thousands of ZEVs for sale in state in less than one calendar year. Continuing through model year 2025, manufacturers will be required to deliver to market hundreds of thousands of ZEVs.

Only 7,000 ZEVs have been sold to date in Massachusetts. Both to ensure that those required for sale under the California regulation move off the lot and to meet its commitment to selling 300,000 vehicles through 2025, the Commonwealth must move expeditiously to redouble its support for ZEVs.

Earlier this year, the Joint Committee on Transportation favorably reported H.4282 and its identical companion bill, S.2266. A number of provisions derived from these bills passed the Senate as part of S.2400, *An Act to promote energy diversity*, but were dropped during conference committee negotiations.

We recommend that H.4282 be amended to reflect the language from the ZEV-related provisions that passed the Senate in S.2400, namely Sections 24, 25, 26, 46, 54, 55, and 58:

- Section 24 – Fair Access Requirements for Public Charging Stations.** This section is based upon a California law passed in 2013, the Electric Vehicle Charging Stations Open Access Act, designed to ensure that charging stations are generally available to the public, and similar provisions were included in Connecticut's electric vehicle law passed this year. This includes (1) a prohibition on "member-only" charging stations, (2) a

requirement to provide payment options that allow access for the general public, (3) disclosure of station information to the public federal database, and (4) forbidding unreasonable restrictions from common interest developments.

- **Section 25 – Municipal Enforcement of ZEV-only Parking.** Under current law, the authority of cities and towns to enforce designated “ZEV-only” parking spaces, such as electric vehicle charging stations and preferential parking spaces, is limited. This section would give new discretionary authority for cities and towns to enforce “ZEV-only” parking with reasonable fines and the ability to tow violators.
- **Section 26 – Building Code Requirements for EV Charging.** The Board of Building Regulations and Standards (“BBRS”) is the entity with direct authority over the Commonwealth’s Building Code. This section would require the BBRS to work with the Department of Energy Resources to promulgate regulations for electric vehicle charging within one year. In particular, requiring new buildings to have the ability to accommodate installation of charging stations in the future is a low-cost measure that will set the Commonwealth up for success in the long run.
- **Section 46 – Interoperability Standards for Billing for Charging Stations.** National efforts are underway to require charging station networks to coordinate billing for customers across different networks. This section allows the Department of Energy Resources to adopt standards if national standards are not adopted.
- **Section 54 – Study on Transportation Funding from ZEVs.** The Department of Transportation, in consultation with the Secretary of Energy and Environmental Affairs and a range of stakeholders, would issue a report on the advisability and feasibility of options to offset projected revenue loss from electric vehicles and other zero emission vehicles. This is an important long-term issue to address, but should be viewed in the broader context of revenue losses due to increasing efficiency standards for internal combustion engine vehicles.
- **Sections 55 and 58 – State Leading by Example.** Current law requires a fuel efficiency standard for passenger vehicles purchased by the Commonwealth. These sections would require this standard to specifically incorporate electric vehicles and other zero emission vehicles, with a requirement of 25% of yearly purchases by 2025. These sections would also require a study on the opportunities for electrification of all segments of the state fleet, including regional transit authorities.

We do not ask for the inclusion of Sections 52 or 53 of S.2400, because Section 52 would duplicate on-going studies to determine the feasibility of providing HOV lane access to ZEVs, and because Section 53 has been superseded by the MassDOT announcement that charging stations are being installed along the Mass Pike this year.

We would welcome the opportunity to answer any additional questions, or discuss this matter further with you, committee members or staff. Thank you for your attention and consideration. We look forward to hearing from you.

Respectfully,

Mark LeBel	Acadia Center
Wayne Weikel	Alliance of Automobile Manufacturers
Casey Harvell	American Lung Association in Massachusetts
Kevin Miller	ChargePoint
Megan Herzog	Conservation Law Foundation
Mark Renburke & Al Dahlberg	Drive Electric Cars New England
Berl Hartman	Environmental Entrepreneurs (E2) - New England Chapter
Josh Craft	Environmental League of Massachusetts
Kea van der Ziel	Greater Boston Physicians for Social Responsibility
David Garriepy	Global Automakers
Bill Ravanese	Health Care Without Harm
Eugenia Gibbons	Mass Energy
Tracy Woodard	Nissan
Janet Gail Besser	Northeast Clean Energy Council
Joel Levin	Plug In America
Tedd Saunders	Saunders Hotel Group
Emily Norton	Sierra Club
Matt Mincieli	TechNet
Will Nicholas	Tesla
Joshua Ostroff	Transportation for Massachusetts
Daniel Gatti	Union of Concerned Scientists