



DATE

Mr. Andrew Johnston
Executive Secretary
Maryland Public Service Commission
6 Saint Paul Street, 16th Floor
Baltimore MD 21202

Dear Mr. Johnston:

On behalf of the Maryland Zero Emission Electric Vehicle Infrastructure Council (ZEEVIC), I am writing regarding Case No. 9478, with comments on the Semi-Annual Progress Report of Baltimore Gas and Electric (BGE), Delmarva Power and Light Company (DPL), and Potomac Electric Power Company (PEPCO) Regarding Implementation of Approved Electric Vehicle Charging Program Offerings. The ZEEVIC was charged by the Maryland legislature to develop policies, recommendations, and incentives that increase awareness of zero emission vehicles (ZEVs), support the ownership of ZEVs, and promote investment by the private sector in ZEVs in Maryland. The ZEEVIC encourages the Public Service Commission (PSC or “the Commission”) to adopt robust reliability requirements for electric vehicle (EV) charging stations under its jurisdiction.

The EV charging reliability is key to the successful integration of EVs into Maryland’s communities and transportation system to help decarbonize Maryland’s transportation sector. As the Commission noted in Order No. 90036, “reliable public charging is critical for EV drivers and instilling public confidence in the EV Pilot and EV adoption generally.” Maryland’s plan for the National Electric Vehicle Infrastructure (NEVI) program similarly stated that unreliable EV chargers “could further fuel range anxiety by creating a negative opinion and experience surrounding charging, which could impact the consumer’s decision to purchase an EV.”

The ZEEVIC recognizes that the challenges to achieving highly reliable EV charging are complex and evolving. While these barriers will not be surmounted overnight, it is essential that Maryland take reasonable and meaningful action to increase confidence in EV charging reliability.

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We support the evaluation and adoption of consistent, transparent, and actionable reliability reporting for EV charging stations under the Commission's jurisdiction, such as those deployed through the utilities' Approved Electric Vehicle Charging Programs. We concur with the PC 44 Work Group recommendation to develop reliability reporting requirements after reviewing utility semi-annual reports filed on February 1, 2023, as well as any final reliability reporting requirements set by the Federal Highway Administration (FHA) for the NEVI program. These comments represent a consensus position of ZEEVIC, whose members may provide further recommendations representing their own individual positions.

Thank you for your consideration. Greater transparency in EV charging reliability reporting will increase accountability and lead to a more reliable EV charging experience, which is necessary to achieve statewide goals to decarbonize Maryland's transportation sector.

If you have any questions or need further information, please contact Virginia Burke, Maryland Department of Transportation (MDOT) Office of Planning and Capital Programming (OPCP) Transportation Air Quality Program Manager, at 410-865-1229 or email at vburke@mdot.maryland.gov. Ms. Burke will be happy to assist you.

Sincerely,

R. Earl Lewis, Jr.
Chairman

cc: Ms. Virginia Burke, Air Quality Program Manager, OPCP, MDOT

Attachment