

March 21, 2022

Chairwoman Julie Alexander
House Agriculture Committee
N-998 House Office Building
P.O. Box 30014
Lansing, MI 48909

RE: House Bill 5893: Electric Vehicle Fueling Systems

Chairwoman Alexander,

I am writing in support of House Bill 5893, which, in part, adds responsibility to the Department of Agriculture to regulate Electric Vehicle Fueling Systems by referencing the tentative standards adopted by the National Conference on Weights and Measures (NCWM) and published in NIST Handbook 44.

Early on, to meet a need for infrastructure, manufacturers rushed to install commercial electric vehicle fueling systems that sell electricity by units of time. Imagine gas stations advertising fuel at \$10 per minute. The dispensers deliver at varying speeds, so you have no idea how many gallons you will receive at one station versus another station. Electric vehicle fueling systems are no different. When selling by time, the consumer does not know how many kilowatt-hours will be delivered.

The State of California proposed a new Electric Vehicle Fueling Systems code for Handbook 44 that represented the effort of a National Working Group made up of regulators, federal advisors, and industry. NCWM's Specifications and Tolerances Committee presented the proposal through a series of Open Hearing. NCWM adopted the new code into Handbook 44 in 2015. Please note that voting rights are extended only to state and local weights and measures regulatory officials who will be charged with enforcing the standards. Industry and federal officials cannot vote on NCWM standards.

The code specifies that the fueling systems sell electricity based on megajoules or kilowatt-hours. It also ensures the consumer has adequate information before, during and after the purchase. That is fundamental in all commercial transactions but lacking in early Electric Vehicle Fueling Systems designs that sell based on time.

NCWM administers the National Type Evaluation Program (NTEP) for commercial weighing and measuring equipment. The states, including Michigan, reference NTEP Certification as assurance that weighing and measuring devices are designed to meet Handbook 44 standards. NTEP is receiving applications now for Electric Vehicle Fueling Systems.

California recognizes NTEP Certification but also administers the California Type Evaluation Program (CTEP). CTEP began certifying Electric Vehicle Fueling Systems earlier than NTEP. CTEP has issued 14 Certificates of Conformance to 11 manufacturers that meet Handbook 44 standards, as shown below. All of these systems advertise and sell on the basis of the kilowatt hour. They also allow the consumer to

monitor the fueling process, provide a detailed receipt, and meet commercial tolerances on accuracy as specified in NIST Handbook 44.

Certificate No.	Company Name	Model
5892-21	AddEnergie Technologies, Inc.	CoRe+ and SmartTWO
5897-21	Blink	Blink IQ 200
5890-21	BTCPower Inc.	EVP-2001-30,40,70, 2002-30,40
5889-21	ChargePoint	CT4000
5895-21	Control Module Inc. (CMI Parent Company of EVSE LLC)	3703, 3704, 3722, 3725
5885b-21	EverCharge Inc	E800-1000, E800-1001
5891-21	Loop Inc.	EVS-32A-L2-001, 002, and EVS-80A-L2-001
5903-22	Phihong Technology Co., Ltd.	AXLU111001D, AXLU111001W
5896-21	Powerflex Systems Inc.	PF-DX
5898-21	Powerflex Systems Inc.	PF - JT48
5902-22	Powerflex Systems Inc.	PF-HCS
5901-22	Powerflex Systems Inc.	PF-Kiosk
5893a-21	SemaConnect Inc.	530, 630, and 830
5900-21	Tellus Power Inc.	UP160J, UP80J

I encourage the Michigan Legislature to recognize the work of NCWM and its stakeholders by incorporating the NIST Handbook 44 Electric Vehicle Fueling Systems Code into your statutes under the “Weights and Measures Act.” NCWM uses a time-proven process for developing quality standards and draws on the best expertise in the world, including weights and measures officials like those in Michigan who work behind the scenes to give us confidence in our daily purchases. Recognition of this new Handbook 44 Code is right for consumers.

Please feel free to contact me with any questions.

Sincerely,

Don Onwiler
 NCWM Executive Director