



The State of New Hampshire  
**Department of Environmental Services**



**Robert R. Scott, Commissioner**

January 23, 2018

The Honorable Regina Birdsell  
Chair, Senate Transportation Committee  
Legislative Office Building, Room 103  
Concord, NH 03301

**RE: SB 575, An Act relative to electric vehicle charging stations.**

Dear Chair Birdsell and Members of the Committee:

Thank you for the opportunity to comment on SB 575. This bill would establish requirements for, and restrictions on, electric vehicle charging stations. The New Hampshire Department of Environmental Services (NHDES) supports this bill and recommends some minor changes as described below.

Motor vehicles are the primary source of oxides of nitrogen and volatile organic compounds and are also the largest single source of greenhouse gas emissions in the state. Electric vehicles (EV) help to reduce these emissions. Many Northeast states have adopted policies and regulations that will result in increased adoption of EVs in our region in the coming years. To support New Hampshire residents who purchase cleaner EVs and to support travel to and throughout New Hampshire by EV adopters in neighboring states, New Hampshire must plan accordingly. SB 575 seeks to ensure that the State of New Hampshire is taking appropriate steps to support the use of EVs in the state.

The bill provides a definition for a number of terms related to EVs and charging infrastructure. NHDES appreciates the clarity provided by defining these terms and proposes the following minor revisions:

- Fuel cell vehicles are a type of EV that utilize a hydrogen fuel cell to power the electric motor. The definition for “fuel cell electric vehicle” would be clearer if revised to state that the fuel source for these vehicles is hydrogen.
- Based on the content of the remainder of the bill the definition for “range-extended battery electric vehicle” is not necessary as the bill provisions are not limited to EV charging stations intended for vehicles with a range of 75 miles or more.
- Paragraph VII proposes a definition for “electronic vehicle charging station”. NHDES recommends the use of the word “electric” instead of “electronic” as “electronic” is not a term that is typically used in this industry.

SB 575 requires the NH Department of Transportation to ensure uniform signage along our highways to show travelers where EV and hydrogen fueling stations are located. The need for uniform signage has been a topic of discussion by the states and provinces that

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participate in the New England Governors and Eastern Canadian Premiers Conference as well as several multi-state staff working groups that are focused on transportation issues.

SB 575 calls for publicly funded chargers that are accessible to the public to apply the Open Charge Point Protocol. NHDES recommends that the bill clarify that the protocol referenced is the Open Charge Alliance protocol<sup>1</sup> and that EV charging station should use the version of the protocol that is current as of the date of installation. We also recommend that the bill clarify that this would only apply to systems installed after the effective date of this bill.

SB 575 requires the New Hampshire Public Utilities Commission to consider several issues related to electric rates that, if left unaddressed, could have the potential to create disincentives for the use of EVs. NHDES recommends that demand charges be included in the list of issues as the potential for these charges has been identified as a significant barrier to those considering installation of "fast" chargers.

In summary, SB 575 seeks to ensure uniformity and consistency for EV drivers across the region. This will instill greater confidence in those considering an EV and help to speed the adoption of these cleaner vehicles, resulting in improved air quality for all our residents.

Thank you again for the opportunity to comment on SB 575. Should you have further questions or need additional information, please feel free to contact Rebecca Ohler, Administrator, Technical Services Bureau ([rebecca.ohler@des.nh.gov](mailto:rebecca.ohler@des.nh.gov), 271-6749) of the Air Resources Division.

Sincerely,



Robert R. Scott  
Commissioner

cc: Sponsors of SB 575: Senators Watters, Birdsell, Feltes, Gannon, Avard, and Fuller Clark, and Representatives Sprague and Oxenham

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<sup>1</sup> <http://www.openchargealliance.org/protocols/ocpp/ocpp-16/>