

April 18, 2025  
Chair Thomas Walsh  
House Transportation Committee  
The General Court of New Hampshire

**RE: Tesla Testimony on SB150 – OPPOSE**

Chair Walsh and Members of the Transportation Committee,

Thank you for the opportunity to submit written testimony on SB 150. On behalf of Tesla<sup>1</sup>, I am writing to express opposition to the bill as currently drafted. As a manufacturer and operator of EV charging equipment, Tesla has engaged for many years in the development of NIST Handbook 44 as it applies to EV chargers, which includes specifications for meter accuracy, price transparency, and labeling requirements. These national standards are still nascent, having only been adopted as “permanent” as of January 1, 2023. Testing charger accuracy is complex relative to other device types, requiring specialized electrical equipment and training, and is challenging given the number of chargers deployed before the specifications in Handbook 44 were finalized.

As a result, regulating states have run into various practical implementation challenges while establishing their programs. Tesla is prepared to collaborate with the Department of Agriculture, Markets, and Food to address these challenges to ensure commercial transactions at EV chargers are fair and equitable. However, we are concerned that as drafted, SB150 will establish a significant regulatory burden in New Hampshire. The passage of SB150 will have several unintended consequences, and further engagement with stakeholders is needed to address these concerns.

**1) Annual inspection of EV chargers will require significant state resources.**

Based on our experience in other states, it will take significant resources for the Department to test and inspect every charger in New Hampshire on an annual basis. Test equipment to confirm accuracy of an EV charger costs \$50,000 to \$100,000 per test unit, and there is currently only one manufacturer of such equipment. Additionally, an inspection may take 30 minutes to 1.5 hours per charger. Tesla understands that other device types are inspected on an annual basis in New Hampshire. However, it would be impractical to establish this same frequency for EV chargers at this time without fully considering the equipment, staffing, and training resources to do so. We are concerned that SB150 sets an infeasible frequency of testing that will lead to inconsistency of enforcement across manufacturers and operators. Other states have established inspection frequency of once every 2-3 years to balance oversight of EV chargers with resource availability.<sup>2</sup>

**2) The Department’s sole authorization to place EV chargers into service will delay station openings.**

Before any device can be used commercially in New Hampshire, it must be placed into service, which involves annual licensing, payment of a fee, and inspection. The norm for all other device types is for Department-licensed entities, known as registered service technicians, to be responsible for placing devices into service and notifying the Department. SB150 would give the Department exclusive authorization to place EV chargers into service. Because station opening will be contingent upon the

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<sup>1</sup> Tesla’s mission is to accelerate the world’s transition to sustainable energy. To accomplish its mission, Tesla designs, develops, manufactures, and sells high-performance fully electric vehicles and energy generation and storage systems, installs, and maintains such systems, and sells solar electricity. Tesla has also invested in its growing network of retail stores, vehicle service centers, electric vehicle charging stations, and advanced manufacturing facilities. Tesla operates 17 Supercharger locations with 166 individual connectors, representing 61% of New Hampshire’s fast chargers.

<sup>2</sup> Oklahoma requires inspection no less frequent than every three years per [OAC 163:14-5-5\(c\)](#). Texas leaves inspection frequency to the discretion of the enforcing agency per [16 Tex. Admin. Code § 96.60](#) on the basis of risk.

Department's ability to send an inspector on-site to place it into service, we are concerned about the potential for bottlenecks and that this will delay new Supercharger openings. This requirement would also increase the scope of work for the state inspector responsible for EV chargers, which again raises the question of state resourcing dedicated to this effort. As the largest operator of DC fast charging stations in New Hampshire, Tesla would prefer to eliminate the potential for bottlenecks and maintain the ability to register service technicians and place devices into service ourselves.

**3) Small businesses in New Hampshire with private shared EV chargers installed will be significantly impacted by the \$175 per device licensing fee.**

In addition to the Supercharger Network, which Tesla owns and operates, Tesla also sells charging equipment to small businesses that offer EV charging services as an amenity. These customers include multifamily properties, workplaces, and hotels that invest in EV chargers to attract and retain tenants, employees, and guests. Under SB150, these entities will be required to submit an annual payment of \$175 per device to the State, which is triple the fee that gas pumps must pay to receive a license. In many cases, the chargers installed at these properties will be located on private property, often behind locked gates or limited-access parking garages, limited to use by specific individuals, and be unavailable to state inspectors without prior coordination. It would be administratively complex to arrange inspection of private shared chargers. Tesla believes private shared chargers at multifamily homes and workplaces should be exempt from Department regulation, regardless of whether they set a per-kWh fee for charger usage. Several states have exempted these chargers from weights and measures oversight, including Texas, Oklahoma, and Vermont.<sup>3</sup>

**4) It would be a massive burden to existing businesses to enforce technical standards for equipment that was installed years before such standards were adopted.**

SB150 would authorize the Department to apply and enforce NIST Handbook 44 retroactively—that is, to chargers that were installed before the specifications in NIST Handbook 44 applicable to EV chargers were adopted nationally. Tesla operates dozens of Superchargers in New Hampshire that were installed between 2015 and 2023, the year the specifications applicable to EV chargers were finalized. We are concerned that retroactive regulation would necessitate rip-and-replace of existing equipment before the end of its useful life and present unreasonably high compliance costs. This process could be a significant disruption to travelers that rely on EV charging to drive into and through New Hampshire. Other states – Texas<sup>4</sup> and Oklahoma<sup>5</sup>, for example – have eased EV chargers into regulation by establishing grace periods that provide 5-10 years for equipment installed before the effective date of state rules to come into compliance with Handbook 44. New Hampshire should adopt a similar approach.

For these reasons, we must respectfully oppose SB150 at this time. We hope to work collaboratively with the sponsor and the Department to resolve these issues and ensure that New Hampshire's regulatory environment remains friendly to new business in the state. Thank you for your consideration.

Sincerely,

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<sup>3</sup> See Texas at [§96.30](#); Oklahoma at [165:14-1-3](#); and Vermont in this [EVSE W&M Guide](#).

<sup>4</sup> [16 Tex. Admin. Code § 96.14](#) requires compliance not later than January 1, 2030 for chargers installed before March 1, 2025.

<sup>5</sup> [OAC 163:14-5-3\(g\)](#) enforces Handbook 44 beginning on November 1, 2041, for all public charging stations that began operations prior to November 1, 2021.