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April 10, 2025

The Honorable Representative Thomas Walsh
Chair, House Transportation Committee
Legislative Office Building, Room 203
33 North State Street
Concord, NH 03301

Re: Request for Amendment of NH SB 150

Dear Chair Walsh and Colleagues

We are submitting this letter behalf of the National Electrical Manufacturers Association (NEMA). NEMA appreciates the intent of this legislation and supports efforts to standardize electric vehicle charging requirements. At this time, we must respectfully request amendment of SB 150 due to unnecessary and costly requirements present in the bill. We are concerned about potential unintended consequences of over-regulation of charging infrastructure.

NEMA is the leading trade organization representing America's electroindustry. Our more than 300 manufacturing companies include producers of reliable, connected, and secure products which are used throughout critical infrastructure sectors and other key markets, such as building infrastructure; building systems; lighting systems; industrial products and systems; utility products and systems; and transportation systems. NEMA members are leading producers of equipment for the mobility market, including electric vehicle ("EV") chargers and charging infrastructure, motors, inverters, and power control and distribution components¹. In New Hampshire, the electroindustry supports more than 14,200 jobs and creates more than \$2.1 billion in GDP contributions².

NEMA is strongly in favor of the efforts to deploy and sustain a nationwide electric vehicle charging infrastructure to support the increasing number of consumers who are choosing EVs. This deployment should strive towards standardization and interoperability and allow for communication and coordination between the vehicle, the charging station, and grid operator to maximize the benefit and convenience for vehicle owners, while not putting undue stress on the distribution system.

NEMA recognizes and supports the increased focus across states to provide uniformity in respective weights & measures laws, regulations, and standards to achieve equity between buyers and sellers in the marketplace and how this applies to public EV charging infrastructure. NEMA has been an active participant in the ongoing development and maintenance of the NIST Handbook 44: Specifications, Tolerances, and Other Technical Requirements for Weighing and Measuring Devices.

Unnecessary State Deployment, Annual Testing and Related Fees.

NEMA questions the feasibility of both deployment of electric vehicle charging being handled exclusively by the state and annual testing of all chargers. Not allowing third-party registered service technicians to place devices into service is a departure from the norm for other device types, could present unreasonable delays to new station openings, and places an extreme cost and resource burden on the state to have adequate staff and equipment on-hand.

Electric vehicle chargers do not require annual testing for effective operation, and the frequency of this testing should be lowered. We highlight that test equipment to enforce meter accuracy standards in NIST Handbook 44 runs \$50,000- \$100,000 per unit, making the cost of purchasing enough equipment to annually test every charger in New Hampshire extremely costly. We have doubts of the feasibility for the state to test EV chargers on an annual basis in a practical, cost-effective, and timely manner.

NEMA notes the state of New Hampshire charges gas pumps a \$54 annual registration fee. Electric vehicle chargers would require \$175 per charger for an annual registration fee. Electric vehicle charging infrastructure will need to be significantly more common than gas pumps to support travel to and from New Hampshire in an EV, meaning this will be a significantly higher burden on electric vehicle supply equipment manufacturers and station operators – which may include small businesses, multifamily properties, and commercial retail spaces.

We support a lower registration fee to match similar devices in New Hampshire. New Hampshire can achieve this lower cost by allowing electric vehicle chargers to be placed similarly to other device types, removing the state's obligation to place all electric vehicle chargers into service. NEMA believes SB 150 as written creates a regulatory framework that will present practical challenges to the state in implementation and undue burden to the industry.

Conclusion

NEMA strongly supports amending SB 150 to remove requirements of state placement on electric vehicle chargers, lowering testing frequency of electric vehicle chargers, and lowering licensing fees of chargers to match similar devices. These steps will greatly reduce the financial

burden on both manufacturers and consumers in New Hampshire and support a robust deployment of electric vehicle charging and infrastructure in the state.

With amendment, SB 150 can support the growth of the electric vehicle market in the state. NEMA is happy to work with your committee to address these concerns and find a solution to these issues. It would be prudent to study the issue with stakeholders to identify a path forward without placing undue regulatory burden on the EVSE manufacturers, charging station operators, and the state.

We appreciate your time and consideration and look forward to hearing from you regarding these questions and comments. We are happy to speak with you further regarding these issues at your convenience.

Best regards,

Christopher Bresee
Director, State Government Affairs
National Electrical Manufacturers Association

CC: Vice Chairman Ted Gorski
Representative Gregory Hill
Representative Charles Foote
Representative Matthew Pitaro
Representative Matthew Coker
Representative Henry Giasson
Representative Joseph Hamblen
Representative George Sykes
Representative Charlie St. Clair
Representative Dru Fox
Representative Daniel Veilleux
Representative Erik Johnson
Representative Marc Plamondon
Representative Seth Miller

¹ Additional information about NEMA may be found at <https://www.nema.org/>.

² [New Hampshire Electroindustry Economic Report](#)