



FLORIDA DEPARTMENT OF AGRICULTURE AND CONSUMER SERVICES
COMMISSIONER NICOLE "NIKKI" FRIED
THE CAPITOL

July 6, 2022

Don Onwiler
Executive Director
National Conference for Weights and Measures
1135 M Street, Suite 110
Lincoln, Nebraska 68508

Mr. Onwiler,

As Florida's Commissioner of Agriculture and Consumer Services and on behalf of the millions of Florida consumers eager to take advantage of electric vehicle infrastructure, I appreciate the continued efforts by the National Conference of Weights and Measures (NCWM) to protect consumers and develop uniform and equitable standards for the commercial use of electric vehicle supply equipment (EVSE). As you may know, Florida's Office of Energy, which is housed in my department, released Florida's first electric vehicle roadmap in 2020 and the state now supports over 5,000 charging stations, ranking second in the nation for number of registered electric vehicles. As the federal government moves forward with a historic investment in EVSE infrastructure, I believe consumers, manufacturers, and state governments would benefit greatly from the designation of national EVSE standards. To accomplish that goal, I strongly support the permanent adoption of Handbook 44 Electric Vehicle Fueling System Code at the upcoming NCWM Annual Meeting on July 14, 2022.

The implementation of EVSE infrastructure is on the rise and will increase exponentially over the next decade as states utilize \$5 billion in funding made available through the National Electric Vehicle Infrastructure (NEVI) formula program to create a national electric vehicle charging station network. While the Federal Highway Administration is in the process of setting minimum standards for projects funded under the NEVI formula program, there is no guarantee the program's standards will conform with existing infrastructure. Additionally, there is no requirement that future EVSE infrastructure created outside the NEVI program, by states or private industry, will adhere to the NEVI program's standards. The lack of a minimum national standard opens the door to a patchwork of EVSE infrastructure across the nation to the detriment of consumers and industry growth.

The divergence of standards for EVSE would encumber the development and adoption of electric vehicles, put consumers at risk, and lead to unnecessary cost for state governments. Private manufacturers are a key component in expanding EVSE infrastructure, however, they are paralyzed without set minimum national standards. The adoption of minimum standards allows manufacturers to research, build, and develop EVSE to a single specification, lowering costs and providing confidence that investments made today will not be invalidated by new standards tomorrow. The uniformity of a national minimum standard is also beneficial for consumers, as they can be confident any interaction with EVSE will provide a consistent and safe experience, regardless of their location. Finally, a minimum national standard is best for states, protecting them from costly retrofitting if different standards were to become the norm. We have a small window to act as the NEVI program begins formulation of its minimum standards and states submit

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their proposals for funding. I applaud the work of the NCWM Specifications and Tolerance Committee along with the Board of Directors for acting on a priority request to vote on permanent standards. The urgency for action is clear as we know that a failure to enact national minimum standards could lead to years of wasted investment, unintended consequences for consumers, and hamper the adoption of electric vehicles. As Commissioner of Agriculture and Consumer Services of the third largest state, such a failure to set national standards could force my department to consider instituting state specific standards, potentially leading to patchwork regulations across state lines as other states feel compelled to take similar action in the absence of national standards. I encourage all NCWM members to seize the opportunity in front of us and take a decisive step towards the safe and efficient adoption of EVSE infrastructure across the country.

Sincerely,

A handwritten signature in blue ink that reads "nicole fried". The signature is written in a cursive, lowercase style.

Nicole Fried
Commissioner of Agriculture