

Multi-Jurisdiction EVSE Filing Fragmentation Matrix

Comparison of device registration, placed-in-service, and service agency filing requirements across enforcing jurisdictions · August 2026

The three jurisdictions below operate mature, documented EVSE device programs. Each is well designed on its own terms. Together they demonstrate the problem: the same regulatory fact — *this device, under this Certificate of Conformance, was examined and placed into commercial service* — must be expressed in three unrelated formats, through three unrelated channels, keyed to three different filing units. Every additional enforcing jurisdiction adds another.

1. Documented programs (agency sources)

Dimension	California	Maryland	Michigan
Adopting instrument	CCR Title 4, Div. 9, §§ 4000–4002.11, adopting NIST Handbook 44 by reference with state-specific amendments	Agricultural Annotated Code, Title 11, adopting the current edition of NIST Handbook 44	Weights and Measures Act, PA 283 of 1964 as amended (eff. 2023), incorporating NIST Handbook 44 by reference
Administering body	CDFA Division of Measurement Standards with county sealers of weights and measures	Maryland Department of Agriculture, Weights and Measures Section	Michigan Department of Agriculture and Rural Development
Filing unit	Device registration administered at the county level; a single operator footprint can span 30+ county jurisdictions	One registration form per location, including port counts	Per-device place-into-service by a Michigan-registered service agency
Placed into service by	County / state process	State: Weights and Measures officially places the charger into service after registration	Registered Service Agency (RSA) places the device into service
Type approval	NTEP or CTEP Certificate of Conformance	NTEP Certificate of Conformance required for all public commercial EVSE	NTEP (or CTEP) approval required for devices installed after March 29, 2023
Phase-in posture	Phased enforcement with state-specific amendments to Handbook 44	All chargers registered no later than July 1, 2026; unregistered public fee-charging devices removed from service	AC devices subject since March 29, 2023; DC EVSE exempt from certain requirements until January 1, 2028
Submission channel	Varies by county: portal, email, and paper processes differ across county jurisdictions	State form per location; spreadsheet-based bulk submission used in practice for large fleets	State process administered by MDARD, RSA-driven

Sources: CDFA DMS, EVSE Regulation Reference Document; Maryland Department of Agriculture, EVSE Registration program; MDARD, Electric Vehicle Fueling Systems program. Rows one through six paraphrase agency publications; the submission-channel row reflects direct multi-state filing practice.

2. Dimensions of divergence observed across enforcing jurisdictions

Beyond the three documented examples, the same dimensions diverge wherever enforcement is active. Each cell below is a question that today has a different answer in nearly every jurisdiction — and no two jurisdictions publish their answers in a common structure.

Dimension	Range observed in practice
Submission channel	Web portal · email attachment · paper mail · spreadsheet template · fax
Filing unit	Per device · per location · per port · per operator fleet

Dimension	Range observed in practice
Placed into service by	State official · county official · registered service agency · operator self-report
Service agency filing window	Filing clocks measured in hours or days from the service event, with different triggers and start points
Renewal cycle	Annual · biennial · none (one-time registration) · tied to inspection
Violation resolution scope	Whole-site re-filing required · per-device correction accepted · undefined
Fee basis	Per device · per port · per location · flat · none
Record format	Free-text forms · agency-specific PDFs · proprietary portal schemas — none machine-readable across jurisdictions

EVSE DEVICE-PROGRAM FRAGMENTATION — every program, a different format



Figure A-1. Jurisdictions documented in this submission (blue). Additional jurisdictions are in adoption, rulemaking, or early enforcement; a maintained 50-state status matrix is available on request.

Consequence. A national operator or service agency must maintain a distinct administrative pipeline per jurisdiction to report identical facts about identical devices. Jurisdictions, in turn, receive filings they cannot cross-reference, aggregate, or audit in common form. The burden compounds with every newly enforcing state — and none of it improves measurement accuracy.