

(Date), 2022

The Honorable Paul G. Pinsky
Senate Education, Health & Environmental Affairs Committee
Miller Senate Office Building,
2 West Wing 11 Bladen St.,
Annapolis, MD, 21401

RE: SB 627 State Building Code – Electric Vehicles

Dear Chairman Pinsky:

The Maryland Building Industry Association, representing 100,000 employees statewide, appreciates the opportunity to participate in the discussion surrounding **SB 627 State Building Code – Electric Vehicles**. MBIA **Opposes** the Act in its current version.

This bill would repeal the Electric Building code and the 2021 Supplement and replace it with new charging station requirements. MBIA respectfully opposes this measure. Changing courses after passing SB 144 before the law can be fully implemented is not a recipe for consistent policy and makes project planning and management more difficult since it erodes faith in a consistent EV charging policy. This bill would also require that the new code will apply to ALL buildings including private residential buildings forcing people that do not drive electric cars to make costly upgrades for vehicles that they do not use. In 2019 the number of cars that were fully electric in the United States represented only about 250,000 vehicles spread out over 50 states. That is a tiny percentage of current vehicles and there is no need for a complete overhaul of the electric vehicle infrastructure of the state to be so dramatically adjusted. There is also the potential for these programs to conflict with county electric vehicle mandates creating confusion. Montgomery County for example already has electric vehicle programs in place that this bill would conflict with.

Additionally, the character of and market in certain jurisdictions that have established criteria, such as Howard and Montgomery is not indicative of the market throughout the State. The comparatively few electric vehicles registered in Maryland are located in higher-density areas, and they are not common. Areas like the Eastern Shore and Southern Maryland do not have a market for electric vehicles yet, but this measure would apply to all new construction across the State, whether such infrastructure will be needed in the near future or not. The Statewide market simply isn't ready for such far-reaching legislative mandates in this area.

This bill will require large scale infrastructure improvements that will spread the costs out among tenants and renters that do not derive any benefit from the program. It is likely that these EV charging stations will not even see regular use. As the market for electric vehicles grows and their usage increases there will be organizations that address their fueling needs in order to meet a market demand. This program would deprive them of that opportunity and mandate an overdeveloped electric vehicle system to meet a demand that may not materialize.

For these reasons, MBIA respectfully requests the Committee give this measure an unfavorable report. Thank you for your consideration.

For more information about this position, please contact Lori Graf at 410-800-7327 or lgraf@marylandbuilders.org.

cc: Members of the Senate Education, Health & Environmental Affairs Committee