

January 15, 2026

Chair Ann Johnson Stewart
3211 Minnesota Senate Bldg.
St. Paul, MN 55155

Chair Johnson Stewart, Vice Chair Elkins, and Members of the Electricity as Vehicle Fuel Working Group:

The City of St. Louis Park and City of Edina (Cities) submit these comments regarding a number of amendments enacted during the 2025 legislative 1st special session that affect electric vehicle supply equipment (EVSE):

1. Chapter 296A (Tax on Petroleum and Other Fuels) section 051 now requires a Public Charging Operator's License for electric vehicle chargers; and
2. Chapter 239.90 (Weights and Measures) now requires that electric vehicle charging station owners pay a \$100 annual inspection fee per port, as well as instituting requirements for method of sale, labeling, and advertising for retail EVSE.

The Cities support consistency in method of sale, labeling, and advertising in support of consumers who utilize the State of Minnesota's growing public charging network. However, the Cities oppose the requirement for a public charging operator's license and the new annual \$100 inspection fee per port for retail EVSE.

- A license is not warranted since any life safety concerns posed by electricity delivered via vehicle charging station would be addressed at the point of installation and code compliance inspection. In addition, the Public Utilities Commission has regulatory oversight of investor and cooperative electric utilities, ensuring electricity is delivered in a safe, cost-effective manner.
- The narrow definition of "public charging station" within the statute limits this license requirement to charging stations that are 1) located at a for-profit business and 2) require a charge (fee) for a customer to use—meaning that any chargers located on tax-exempt parcels or offered for free are exempt from the operator's license, posing an inconsistency that clouds the purpose of the statute. Additionally, chargers that are free to use for the first hour or longer are in a legal gray area.
- "Retail EVSE" is not defined in statute, creating additional confusion of what stations would be required to pay an inspection fee. Assuming EVSE owned by government agencies, multi-family properties, and other private entities that charge for the stations use would be covered, both of the Cities would assume a new \$2,400 annual cost burden to operate their stations, and possibly much more depending on whether fleet chargers are included in the definition.
- Many publicly accessible EV charging stations are connected to managed networks, which automatically notify operators of outages, errors, or damage at any port. Additional regulations of the station ports themselves are not needed. Visual inspections of retail EVSE, where there is no risk of fuel spills or leaks, are an imprudent use of state tax dollars and city staff time, especially when there is no meter to inspect (most public chargers in Minnesota are level 2 and are tied into the electricity meter of the adjacent facility) and EVSE products that are sold to the public must already meet National Institute of Standards and Technology Handbook 44 standards for accuracy.
- The State of Minnesota, the Cities, Hennepin County, and over 20 additional local units of government throughout the state have specific climate and energy action plan goals to increase

access to EV chargers through public investment in EVSE. Increasing the cost and administrative commitment for installing and owning these stations through fees and licensing will reduce the number of publicly available stations, slowing adoption of electric vehicles at a time in which the state and most cities are already not on track to reach their climate goals.

We thank the members for consideration of our comments.

Respectfully submitted,



Emily Ziring
Sustainability Manager
City of St. Louis Park



Marisa Bayer
Sustainability Manager
City of Edina



CC:

Minnesota Department of Commerce, Division of Weights & Measures staff:

- Brett Willhite, Director
- Valare Falkner, Deputy Director
- Greg VanderPlaats, Assistant Director
- Nick Santori, Assistant Director