

**CONFIDENTIAL**  
**LEGISLATIVE BILL REVIEW FORM: 2014**

Bill Number: S.176      Name of Bill: An act relating to identifying electric vehicles

Agency/Dept.: Environmental Conservation

Author of Bill Review: Tom Moyer

Date of Bill Review: 12/20/13

Status of Bill (check one):

☒ Upon Introduction    ☐ As passed by 1<sup>st</sup> body    ☐ As passed by both bodies    ☐ Fiscal

Recommended Position:

☐ Support    ☐ Oppose    ☒ Remain Neutral    ☐ Support with modifications identified in #8 below

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**Analysis of Bill**

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**1. Summary of bill and issue it addresses.** *Describe what the bill is intended to accomplish and why.*

This bill proposes to require the DMV to issue distinctive registration and windshield stickers to registrants of electric vehicles and to require the registrants to affix the stickers to the rear registration plate and to the windshield of the vehicle. Although not stated in the proposed bill, it is our understanding that the primary purpose of this proposed requirement is to help protect emergency response personnel from the potential risks posed by the high voltage electrical systems and batteries used in hybrid-electric and all-electric vehicles.

**2. Is there a need for this bill?** *Please explain why or why not.* It is not clear that there is a need for this bill. There may be other mechanisms for accomplishing the intended purpose.

**3. What are likely to be the fiscal and programmatic implications of this bill for this Department?**

We are not aware of any direct fiscal implications for DEC, although we assume DMV and others would seek technical assistance from DEC regarding issues relating to applicability to vehicle types, etc.

**4. What might be the fiscal and programmatic implications of this bill for other departments in state government, and what is likely to be their perspective on it?** The primary fiscal and programmatic implications of this bill would be for DMV. DMV would need to make revisions to their computer system and certain forms in order to track information, would incur on-going costs for purchase and distribution of stickers, and would be responsible for processing and tracking infractions.

**5. What might be the fiscal and programmatic implications of this bill for others, and what is likely to be their perspective on it?** *(for example: public, municipalities, organizations, business, regulated entities, etc.)*

There would be implications for individuals, organizations and businesses that own/operate electric and hybrid-electric vehicles. They would be required to affix stickers to their vehicles, and would be subject to a fine of not less than \$50 for non-compliance. Violations could potentially result in license suspension for failure to pay/respond to a ticket.

**6. Other Stakeholders:**

*Please return this bill review as a Microsoft Word document to [Laura.Gray@state.vt.us](mailto:Laura.Gray@state.vt.us)*

**6.1 Who else is likely to support the proposal and why?** Some emergency response personnel would presumably support this proposal as it would help to identify Vermont-registered vehicles that could pose risks associated with high voltage electrical systems and batteries.

**6.2 Who else is likely to oppose the proposal and why?** Some owners of electric and hybrid-electric vehicles may oppose this proposal as it would impose additional requirements on registrants of these vehicles as compared with registrants of conventional vehicles and other alternatively fueled vehicles, and would subject them to penalties for non-compliance. Vehicle manufacturers and dealers may oppose this proposal as it could create the perception that these vehicles are unusually dangerous.

**7. Rationale for recommendation:** *Justify recommendation stated above.* Although this proposal appears well intended, there are shortcomings. We are not aware of evidence suggesting electric and hybrid electric vehicles pose a greater overall risk to emergency responders as compared with the risks associated with conventional vehicles or other alternatively fueled (e.g., compressed natural gas) vehicles. While this proposal would help first responders to identify Vermont-registered electric vehicles, it would not aid in identifying vehicles registered in another jurisdiction that are operating in Vermont. If it is determined that identification of electric vehicles for emergency responders is necessary, a consistent method of identification for all electric vehicles, regardless of the jurisdiction in which they are registered, would be preferable. However, we are not aware that a national uniform standard or recommendation for identifying electric vehicles has been developed, nor are we aware of any states that have yet addressed this specific concern (Massachusetts allows but does not require electric vehicles to display a special "EV" plate, but does not use stickers). Some have suggested that stickers identifying electric vehicles could also be used as incentives for all-electric and plug-in hybrid electric vehicles (e.g., free parking, use of HOV lanes, helping to ensure conventional vehicles do not occupy parking spaces that provide charging capability, etc.), however under this proposal, the same stickers would apply to all electric and hybrid-electric vehicles, including those that are not plug-in.

**8. Specific modifications that would be needed to recommend support of this bill:** *Not meant to rewrite bill, but rather, an opportunity to identify simple modifications that would change recommended position.*

In order to recommend support of this bill, we would suggest modifications that would require, if and when developed, use of national uniform standards for identification of all alternatively fueled vehicles determined to pose risks to emergency responders that are significantly different than the risks already posed by conventional vehicles. We would also recommend modifications that would encourage more comprehensive and consistent training for emergency responders in these matters.

Commissioner has reviewed this document: \_\_\_\_\_

Date: \_\_\_\_\_

Secretary has reviewed this document: \_\_\_\_\_

Date: \_\_\_\_\_