



County of Monterey

Board of Supervisors

Luis A. Alejo, District 1
Glenn Church, District 2
Chris M. Lopez, District 3
Wendy Root Askew, Chair, District 4
Kate Daniels, Vice Chair, District 5

Clerk of the Board
168 West Alisal St. 1st Floor
Salinas, CA 93901
831 755 5066
cob@co.monterey.ca.us

May 11, 2026

The Honorable Sabrina Cervantes
Senate Appropriations Committee
State Capitol, Room 412
Sacramento, CA 95814

RE: SB 1327 (Reyes) Transfer of EVSE Regulatory Authority - OPPOSE

Dear Chair Cervantes,

On behalf of the County of Monterey, I am writing to respectfully express our strong opposition to SB 1327, which seeks to dismantle California's century-old weights and measures framework for Electric Vehicle Supply Equipment (EVSE) by transferring regulatory authority to the California Energy Commission (CEC).

While the County of Monterey fully supports the rapid deployment of EV infrastructure, SB 1327 represents a fundamentally flawed policy shift that compromises consumer protection, fragments market integrity, and creates unnecessary fiscal burdens for both state and local governments.

The Essential Role of CDFA and County Sealers

The California Department of Food and Agriculture (CDFA) Division of Measurement Standards (DMS), in partnership with County Sealers, operates a robust, uniform program ensuring that every commercial transaction is accurate and fair. We urge you to maintain this authority within the CDFA for the following reasons:

- **Existing Expertise and Local Responsiveness** - County sealers are already trained, equipped, and licensed to perform on-the-ground inspections. The 439 licensed Weights and Measures Inspectors across California's 58 counties provide a level of local responsiveness and field expertise that the CEC, a centralized policy agency, is not equipped to replicate.
- **Proactive Protection vs. Reactive Oversight** - Currently, County Sealers conduct systematic, on-site inspections to verify device accuracy. SB 1327 moves toward randomized "spot-checks" and complaint-driven enforcement. This shift places the burden of detecting inaccuracies on the consumer, allowing billing errors to persist until reported.
- **Delayed Response to Consumer Complaints** - By centralizing authority in Sacramento, SB 1327 will inevitably lead to significant delays in responding to consumer complaints. Local County Sealers currently provide immediate, on-site resolutions to consumer complaints. Transitioning to a distant, state-level administration without a local field presence ensures that inaccurate EVSE's will remain in service longer, frustrating drivers and eroding confidence in the EV marketplace.
- **Neutral Third-Party Verification** - A fundamental principle of California's marketplace is that commercial devices are verified by an unbiased government official. SB 1327 shifts away from this golden standard by introducing pathways for manufacturers to self-test and self-certify. Replacing neutral, third-party oversight with industry

- -led validation creates a clear conflict of interest, invites market inequity, and fundamentally erodes public trust in the accuracy of EV charging costs
- **Prevention of Regulatory Fragmentation** - Electricity sold as a motor vehicle fuel is a commodity. Carving EVSE out of the Business and Professions Code sets a dangerous precedent that could lead to the fragmentation of other measuring categories, such as water, gas, or electric submeters, ultimately dismantling the uniform standards that protect the California economy and consumers.

Significant Fiscal Impacts and Duplication of Resources

From a fiscal perspective, the transition to the CEC represents a fiscally irresponsible duplication of existing government functions, resulting in immediate and long-term cost to the state and local jurisdictions:

- **Costly State Redundancy** - CDFA's California Type Evaluation Program (CTEP) is the only laboratory in the nation certified for EVSE National Institute of Standards and Technology (NIST) compliance. Shifting this to the CEC forces the State to spend millions to replicate laboratory facilities, recruit technical staff, and build a new enforcement bureaucracy from the ground up, all to replace a system that already exists and functions.
- **Unsustainable Funding Model** - Currently, the registration fees collected from station owners cover only approximately 40% of the actual cost of inspection and enforcement. Local county jurisdictions invest in their local Weights and Measures programs at a statewide average cost of \$1.85 per capita to ensure consumer protection and a fair level playing field among businesses. Shifting this responsibility to the CEC would force the State to either dramatically increase registration fees on station owners or require massive general fund appropriations to close the funding gap.
- **Loss of Operational Efficiency** - County Sealers currently maximize efficiency by inspecting multiple device types, such as gas pumps, scales, and EV chargers, in a single trip. Segmenting EVSE oversight forces the State to fund separate, more expensive travel for single-device inspections across 58 counties, significantly increasing the carbon footprint and fiscal cost of the regulation.
- **Stranded Local Investments** - In proactive support of the State's EV goals, the County of Monterey has acted in good faith to build a robust regulatory infrastructure, investing \$129,000 in specialized EVSE testing equipment. This significant capital expenditure, paired with hundreds of hours and substantial fundings dedicated to specialized multi-day training courses, was a targeted investment to provide long-term consumer protection for our residents. SB 1327 would render these investments and hard-earned technical expertise of local personnel obsolete, effectively stranding local taxpayer-funded assets.

EV charging equipment is a commercial measuring device used to calculate the price of a fuel commodity. It must remain subject to the same rigorous regulatory structure as gas pumps and utility submeters. California's current system is not broken; it is a national leader in measurement accuracy and consumer protection.

For these reasons, the County of Monterey respectfully opposes SB 1327. Should you have any questions regarding our position please contact Senior Policy Advisor, Ashley Walker at 916-930-7780.

Sincerely,

Wendy Root Askew, Chairperson
County of Monterey Board of Supervisors