March 8, 2022

Chairman Bobby Lee Rush
US House of Representatives
House Committee on Energy and Commerce
Chair Energy Subcommittee
Independence Ave. and S. Capitol St. SW
RHOB- Rayburn House Office Building, Room 2188
Washington, DC 20515-1301

Charging Forward: Securing American Manufacturing and Our EV Future

Dear Chairman Rush and Members of the House Energy Subcommittee,

A2LA appreciates the opportunity to provide a statement to the U.S. House of Representatives Committee on Energy and Commerce Subcommittee on Energy as part of its hearing on Charging Forward: Securing American Manufacturing and Our EV Future. With the historic investment made in electric vehicles and a nationwide charging network, A2LA wishes to focus these remarks on support for the public safety component of an electric vehicle charging network.

Established in 1978, A2LA provides independent, world-class accreditation programs that inspire confidence in the quality and security of services and acceptance of results from our accredited organizations. A2LA, a nonprofit accreditation body with over 4000 actively accredited organizations, supports a broad array of industries including food and agricultural testing, environmental, pharmaceutical, aerospace, mining, telecommunications, defense, clinical, consumer products, and construction, electrical and automotive.

Accreditation is an impartial and objective process that determines the technical competence, integrity, accuracy, reliability, and impartiality of organizations conducting testing and inspections. When an organization is accredited, it has demonstrated that a prescribed level of technical competence has been achieved. Accreditation of manufacturers and inspectors of electric vehicle charging stations means increasing the confidence in data produced, eliminating redundant reviews, providing a means of qualifying contractors/grant recipients, building greater public trust, and redirecting government resources to enforcement and oversight.

Electric vehicle charging stations are designed to provide a safe connection between the vehicle and the electric grid. These charging stations must be able to communicate with a vehicle's control system, and appropriate voltage and meter levels must be ensured. The elements of a stations may include, as examples, a grounding and ungrounding conductor, electric vehicle connectors, attachment plugs, power outlets, wiring, receptacle, and other devices to ensure the transfer of energy from the station to a vehicle.

As with many other manufactured devices that involve electrical current, from air fryers to hair dryers to home lighting and air conditioning, a seal of approval is sought before placed into use. Accreditation is used to ensure these products and services are safe and reliable.

There are established standards upon which electric vehicle charging stations should rely. The International Organization for Standardization (ISO) and the International Electrotechnical Commission form a worldwide system for standardization. ISO/IEC 17025 provides requirements for the competence of testing and calibration laboratories, thus ensuring greater confidence in measurement results. Manufacturers accredited to ISO/IEC 17025 ensure the performance of a variety of industry equipment, components and full systems and the reliability of its test data. For electric vehicle charging stations, this may include cables, meters, generators, transformers, plugs and sockets, instruments, power supplies, electromechanical equipment, high voltage power, battery charging systems, interoperability, and more.

ISO/IEC 17065 is the standard used by accreditation bodies for product certification. Once the electric vehicle charging stations are assembled, this standard provides the product certification offering confidence that the product and its processes meet their intended use in the marketplace.

ISO/IEC 17020 provides the standards for the operation of inspections. The requirements define and document the competencies needed for all personnel involved in inspection activities. They also address equipment needs, recordkeeping, inspection procedures, management reviews, audits, impartiality, and corrective and preventive actions. This would apply to electric charging vehicles once they have been assembled and in use. Inspectors will be used to check the sites, assess the equipment and the impact of environmental conditions (such as excessive sun or snowstorms), and determine corrective and preventive actions. Accreditation bodies use ISO/IEC 17020 to define and document the competencies needed for all personnel involved in inspection activities.

As the committee deliberates on the future of electric vehicle charging stations, we ask that testing and calibration laboratories are accredited to ISO/IEC 17025; product certification is accredited to ISO/IEC 17065; and inspections be conducted by inspection bodies accredited to ISO/IEC 17020. All accreditation bodies should be a signatory to the International Laboratory Accreditation Cooperation (ILAC) Mutual Recognition Arrangement, which promotes the free-trade goal of “accredited once, accepted everywhere.”

A2LA thanks the Subcommittee for this hearing and for your consideration of these remarks. We welcome the opportunity to work with you and other members of Congress to “charge forward” in a safe and reliable manner.

Sincerely,

Lonnie Spires
President and Chief Executive Officer
American Association for Laboratory Accreditation (A2LA)