



August 13, 2024

Enrique Rodriguez
Associate Construction Analyst
California Building Standards Commission
2525 Natomas Park Drive, Suite #130
Sacramento, CA 95833

Via Email: cbsc@dgs.ca.gov & Enrique.Rodriguez@dgs.ca.gov

CC: Mitchel.Baker@hcd.ca.gov, Title24@hcd.ca.gov, others listed below

Re: EVACAC 15-Day comments on CBSC Express Terms for Revised Proposed Building Standards (CALGreen code)

Dear Mr. Rodriguez:

The **EV Charging for All Coalition (EVACAC)** is pleased to offer the following comments and recommendations to the California Building and Standards Commission (CBSC).

1) Corrections to Table 5.106.5.3.1

Corrections were made to the first row of Table 5.106.5.3.1, indicating the range should be 1 to 9 parking spaces for the first category. The same correction was made in 5 other tables. EVACAC supports these clarifying corrections.

2) Corrections to Table A5.106.5.3.4 (Tier 2 EVCS power allocation method)

This table is intended to offer an alternative to Table A5.106.5.3.3 Tier 2 EV Capable spaces and EVCS. The 15-Day comment period changes are a correction to the calculations of the Table A5.106.5.3.4 power equivalents for EVCSs to the power required for the number of EV Capable spaces in Table A106.5.3.3. The power required for an EV capable space was incorrectly calculated using 240 Volts times 40 Amp circuit capacity ($P = 240 \times 40 / 1000 = 9.6 \text{ kVA}$) rather than 208 Volts times 32 Amps maximum allowed current ($P = 208 \times 32 / 1000 = 6.6 \text{ kVA}$). The issue here is not whether the option to provide fewer higher capacity chargers is to be allowed but a correction of the EVCS power budgets to be consistent with the power required for the EV capable spaces. EVACAC approves of these corrections to the power allocation calculations.

In conclusion, EVCAC sincerely thanks HCD for the opportunity to provide feedback in the EV Working Group meetings during CALGreen Triennial Code Cycle process. We continue to express strong support for improved access to convenient, inexpensive, safe and reliable charging at home — which will help to lower barriers to equitable EV adoption at scale. We applaud the overall progress that has been made towards ensuring universal EV Ready access to charging in newly-built apartments and condominiums in the 2024 Triennial Code cycle.

We look forward to working with HCD, DSA, CBSC, as well as other state agencies and stakeholders to continue California’s leadership in the electrification of our transportation systems and the development of equitable EV charging infrastructure building code provisions for residents of both single- and multi-family housing.

Sincerely,

Dennis Corelis (Architect) on behalf of the **Electric Vehicle Charging for All Coalition Leadership Team:**

Wendy Chou, Coalition & Project Senior Manager, Acterra

Marc Geller, Plug In America

Guy Hall, Electric Vehicle Association

Linda Hutchins-Knowles, EMC: Electrification & eMobility Consulting

Dwight MacCurdy, EV Advisor and Project Manager

Michelle Pierce, Electrical Engineer, EV Advocate

Sven Thesen, EV Policy & Infrastructure Consultant, EVCAC Founder

Vanessa Warheit, National Lead, EVCAC

Zack Wurtz, Director of Operations, Acterra

CC:

Adrienne.Harris@arb.ca.gov
Ali.Koohestani@arb.ca.gov
Analisa.Bevan@arb.ca.gov
Andrew.Martinez@arb.ca.gov
annalisa.schilla@arb.ca.gov
banpreet.bhambra@arb.ca.gov
Belinda.Chen@arb.ca.gov
Jennifer.gress@arb.ca.gov
Joshua.Cunningham@arb.ca.gov
Kathy.Jaw@arb.ca.gov
lauren.sanchez@gov.ca.gov
Lisa.macumber@arb.ca.gov
Sam.Lerman@arb.ca.gov
zhen.dai@arb.ca.gov
Corey.Permann@energy.ca.gov
danuta.drozdownicz@energy.ca.gov
hannon.rasool@energy.ca.gov
Ken.Rider@energy.ca.gov
Larry.Rillera@energy.ca.gov
mark.wenzel@energy.ca.gov
melanie.vail@energy.ca.gov
Mona.Badie@energy.ca.gov
Peter.Strait@energy.ca.gov
simon.lee@energy.ca.gov
will.vicent@energy.ca.gov
<Michael.Truax@cpuc.ca.gov>
Abhilasha.Wadhwa@cpuc.ca.gov
Audrey.Neuman@cpuc.ca.gov
Ed.Pike@cpuc.ca.gov
jennifer.kalafut@cpuc.ca.gov
Nick.Zanjani@cpuc.ca.gov
paula.gruendling@cpuc.ca.gov
cbsc@dgs.ca.gov
Enrique.Rodriguez@dgs.ca.gov
Mia.Marvelli@dgs.ca.gov
Hannah.Goldsmith@gobiz.ca.gov
tyson.eckerle@gobiz.ca.gov
cortney.copeland@gobiz.ca.gov
grace.curtis@gobiz.ca.gov
heather.hickerson@gobiz.ca.gov
gia.vacin@gobiz.ca.gov
Thomas.G.Martin@hcd.ca.gov

Emily.Withers@hcd.ca.gov
Gustavo.Velasquez@hcd.ca.gov
janeen.dodson@hcd.ca.gov
Jenna.Kline@hcd.ca.gov
Kyle.Krause@hcd.ca.gov
matt.schueller@hcd.ca.gov
Megan.kirkeby@hcd.ca.gov
Mitchel.Baker@hcd.ca.gov
monica.hernandez@hcd.ca.gov
Pedro.Galvao@hcd.ca.gov;
Randall.Enrico@hcd.ca.gov
ryan.seeley@hcd.ca.gov
Thomas.g.Martin@hcd.ca.gov
zachary.olmstead@hcd.ca.gov
James.hacker@gov.ca.gov
Andrea.Escobar@gov.ca.gov
Czarlene.Manangan@hcd.ca.gov
jason.elliott@gov.ca.gov
Marshall.Comia@gov.ca.gov
Sam.Assefa@opr.ca.gov
Sasha.Kergan@bcsh.ca.gov
scott.morgan@opr.ca.gov
Karen.Douglas@gov.ca.gov
kgjohnson@rivian.com
Kristian@caletc.com
nderrickson@tesla.com
Sdouglas@autosinnovate.org
dbowerson@autosinnovate.org
cbullis@flo.com
Ken.Branson@sen.ca.gov
Tina.Andolina@sen.ca.gov
winifred.yancy@ladwp.com
pkobernick@peninsulacleanenergy.com
rreyes@peninsulacleanenergy.com
Conrad.Asper@pge.com
KACV@pge.com
ailsa.yew@sce.com
naveed.h.ahmad@sce.com
matt.londre@se.com
vince.wiraatmadja@se.com
barry.hooper@sfgov.org
tosullivan@sfgov.org
gary.gluck@siemens.com

justin.zagunis@svcleanenergy.org

nupur.hiremath@svcleanenergy.org

zoe.elizabeth@svcleanenergy.org