June 28, 2024

Submitted via email: cbsc@dgs.ca.gov

Re: CalETC's Comments on the 2024 Triennial Code Adoption Cycle of the CalGreen Code

The California Electric Transportation Coalition (CalETC) respectfully submits the following comments to the Building Standards Commission (BSC) and Department of Housing and Community Development (HCD) on the proposed 2024 CalGreen Code. We greatly appreciate BSC's and HCD's commitment to improving electric vehicle (EV) charging standards in California and your willingness to work with stakeholders on these improvements.

CalETC supports and advocates for the transition to a zero-emission transportation future to spur economic growth, fuel diversity and energy independence, contribute to clean air, and combat climate change. CalETC is a non-profit association committed to the successful introduction and large-scale deployment of all forms of electric transportation. Our Board of Directors includes representatives from: Los Angeles Department of Water and Power, Pacific Gas and Electric, Sacramento Municipal Utility District, San Diego Gas and Electric, Southern California Edison, Southern California Public Power Authority, and the Northern California Power Agency. In addition to electric utilities, our membership includes major automakers, manufacturers of zero-emission trucks and buses, electric vehicle charging providers, autonomous electric vehicle fleet operators, and other industry leaders supporting transportation electrification.

CalETC supports the proposed changes to the CalGreen Code for non-residential and residential buildings. We continue to support the transition away from EV Capable spaces to EV Ready or EV installed spaces. Last year, California had record sales of EVs and deploying EV chargers is critical to meeting the fueling needs of today and the future. We continue to encourage BSC and HCD to increase the requirements for installed EV chargers. We also support the efforts to futureproof the code by requiring raceway and conductors that are sized to support 208/240-volt 40-ampere circuits. This requirement will help avoid significant retrofit costs should these chargers need to be upgraded in the future.

Changes to Requirements for Existing Multifamily Buildings

CalETC supports the proposed code Section 4.106.4.3 and its exception for existing buildings, which allows Level 1 EV charging receptacles to be installed without triggering the higher power EV charging requirements. Expanding access to home charging at multifamily buildings is a key barrier that must be overcome for California to meet its ambitious zero-emission vehicle, climate, and pollution reduction goals. The California Energy Commission (CEC) forecasts that we will need 1.01 million EV chargers by 2030 to support approximately 7 million light-duty EVs. We currently have only 105,000 public and shared private chargers, just 10% of the chargers we will need in 2030, which means we have only six years to install roughly 900,000 chargers. Our ambitious goals require that all reasonable options be available and Level 1 charging for existing buildings is one of those options. Level 1 typically

charges an EV about 5 miles of range per hour, which will give a car roughly 40 miles on an 8-hour charge. The average driver in California drives about 40 miles per day, so Level 1 charging can be satisfactory in many circumstances.[1] Additionally, Level 1 receptacles and EV supply equipment (EVSE) are less expensive and can often be installed without the utility needing to upgrade the electrical service to the building, which can save the building owner time and money.

While we support the proposed language, CalETC recommends broadening the exception to Section 4.106.4.3 to allow Level 1 EVSE to be used in addition to Level 1 receptacles, and account for situations where EV chargers are already installed at altered parking spaces. We recommend using the following exception to Section 4.106.4.3:

> Exception: Where (A) work requiring a permit is being performed for the installation of level 1 EV charging receptacles or level 1 EVSE; or (B) the altered parking spaces have access to EV charging.

The charging market continues to evolve and Level 1, Level 2, and DC Fast Charging are all useful charging strategies that fit best in certain situations. CalETC continues to advocate for Level 2 charging in new construction because of load management and vehicle-to-grid capabilities, it can serve a larger number of vehicles, and can take greater advantage of off-peak pricing. However, we need all strategies on the table for existing buildings, including Level 1 charging.

We greatly appreciate BSC's and HCD's efforts on the 2024 Triennial Code Cycle and look forward to continuing to work with you on developing the EV charging requirements. Thank you for your consideration of our comments and do not hesitate to contact us if you have any questions.

Best regards,

Kristian Corby, Deputy Executive Director, CalETC

[1] *Car and Driver* reported that the Federal Highway Administration found that Californians drive 14,435 miles per year, or 39.55 miles per day. See https://www.caranddriver.com/auto-loans/a32880477/average-mileage-per-year/.