



June 27, 2024

Submitted via email to cbsc@dgs.ca.gov, Kevin.Day@dgs.ca.gov, and Mitchel.Baker@hcd.ca.gov.

Re: Peninsula Clean Energy Comments on Proposed CALGreen Code, 45-Day Review Period

Staff and members of HCD, BSC and Green Building Code Advisory Committee,

Peninsula Clean Energy Authority (PCE), the community-choice energy program for San Mateo County and the City of Los Banos and founding partner in the Bay Area Reach Codes project,¹ which is helping local cities advance building electrification and electric vehicle (EV) charging readiness through new building codes, submits these comments in response to the CALGreen 45-day public comment period. PCE applauds amendments in the 2025 CALGreen California Building Standards Code, Part 11 (“Code”) that expands access to EV charging for all residents of new multi-family properties and improvements made to multi-family additions and alterations so that Level 1 charging remains as an important option. This letter provides some minor suggestions that may help provide clarity for specific components of the code as currently written.

Recent changes to exempt Level 1 charging in the Additions and Alterations section for multi-family housing (Section 4.106.4.3) are a major improvement that PCE fully supports as it will ensure that Level 1 charging remains a critical tool in the expansion of EV charging access for these types of properties. Some additional clarifying language may be helpful to provide certainty that the requirements of section 4.106.4.3 do not impact any existing EV charging that has already been installed. For instance, if a property had previously installed Level 1 charging and undergoes an alteration as defined in this section, these properties should not have to upgrade their existing Level 1 EV charging to a low-power Level 2 outlet or Level 2 charger as this may further discourage properties from voluntarily installing large quantities of EV charging. Additional flexibility is also encouraged to accommodate Level 1 EV charging stations, in addition to just Level 1 receptacles.

A suggested modification to the exception language of 4.106.4.3 as currently drafted is included below (*italics* represent additions and ~~strikethrough~~ represent deletions):

Exception: Where *1-* work requiring a permit is being performed for the installation of *level 1 EV charging 120-volt electrical* receptacle(s) *for Level 1 charging or level 1 EVSE; or 2- the altered spaces already have EV charging installed.*

Recent changes to section 5.106.5.4.2 that require the utilization of existing EV Capable spaces first are a good improvement that PCE supports. Transforming EV Capable spaces to EVSE is a

¹ <https://bayareareachcodes.org/>

cost-effective way to install EV charging while rewarding properties that have had the foresight to install these future-proofing measures and it's appropriate for the code to encourage this type of EV charging installation.

Additional clarification in section 5.106.5.4 pertaining to additions and alterations of non-residential facilities may also be helpful to avoid unintended consequences. In this section, properties are required to install charging when a qualifying alteration occurs in the amounts outlined in section 5.106.5.3.1 or the power allocation method outlined in 5.106.5.3.6. One of these triggers of section 5.106.5.4 is quoted below.

3. When additions or alterations to existing buildings are triggered pursuant to code Section 301.3 and the scope of work includes an increase in power supply to an electric service panel.

It would be helpful to add clarifying language that limits these trigger additions and alterations only to the impacted component of specific parking areas. This is because other projects which do not pertain at all to this type of parking would otherwise trigger this requirement and may discourage these projects. For example, installing solar power at an existing building in which a power supply increase is included would trigger the installation of EV charging, likely discouraging the solar project. Another example would be the installation of fleet-specific EV charging as part of a program such as PG&E's EV Fleets Program. This project would likely yield an increase in the power supply through a dedicated meter for the fleet EV chargers and would trigger the requirements of section 5.106.5.4 to install additional EV charging in (likely) a separate part of the property, possibly discouraging these types of important projects. For trigger 3, quoted above, PCE suggests that the overall power supply increase should be sufficient to support the charging required in either sections 5.106.5.3.1 or 5.106.5.3.6, but not require the installation of the EV charging stations at that time. While encouraging EV charging in alterations and additions is important, careful consideration should be made so as not to discourage other types of important projects.

PCE again thanks staff for the importation improvements and overall advancements made in the most recent iterations of this code cycle, which will help accelerate the much-needed EV charging across the state.

Respectfully submitted,

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Peninsula Clean Energy