

**From:** [DGS Website@DGS](mailto:DGS_Website@DGS)  
**To:** [CBSC@DGS](mailto:CBSC@DGS)  
**Subject:** PUBLIC COMMENT on PROPOSED BUILDING STANDARDS - Phillip Kobernick  
**Date:** Thursday, October 28, 2021 3:51:24 PM

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Commenter Contact Information

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Proposed Building Standard

Title 24 Part #: Part 11  
Section #: 4, 106.4.2.2 Item 3  
Proposing State Agency: HCD and BSC  
This comment is intended for review during: 15-Day Comment Period

Your recommendation based on the criteria of Health and Safety Code Section 18930(a):  
Further Study Required

In support of your recommendation above, provide the rationale based on the criteria of Health and Safety Code Section 18930(a). If you recommend anything other than approve, cite the criteria in your comment. If you oppose a proposed building standard, offer a solution or alternative for the state agency to consider.

The section as currently proposed is:

When (begin double underline) low power Level 2 EV charging receptacles or (end double underline) Level 2 EVSE(begin double strikeout) is (end double strikeout) (begin double underline) are(end double underline) installed beyond the minimum required, an automatic load management system (ALMS) may be used to reduce the maximum required electrical capacity to each space served by the ALMS. The electrical system and any on-site distribution transformers shall have sufficient capacity to deliver at least 3.3 kW simultaneously to each EV charging station (EVCS) served by the ALMS. The branch circuit shall have a minimum capacity of 40 amperes and installed EVSE shall have a capacity of not less than 30 amperes. ALMS shall not be used to reduce the minimum required electrical capacity to the required EV capable spaces.

We propose re-writing this section as:

When (begin double underline) low power Level 2 EV charging receptacles or (end double underline) Level 2 EVSE(begin double strikeout) is (end double strikeout) (begin double underline) are(end double underline) installed beyond the minimum required\*, an automatic load management system

(ALMS) may be used to reduce the maximum required electrical capacity to each space served by the ALMS. The electrical system and any on-site distribution transformers shall have sufficient capacity to deliver at least 3.3 kW simultaneously to each EV charging station (EVCS) served by the ALMS. The branch circuit shall have a minimum capacity of 40 amperes and installed EVSE shall have a capacity of not less than 30 amperes. ALMS shall not be used to reduce the minimum required electrical capacity to the required EV capable spaces.

\*If ten (10) percent or more of the total number of parking spaces are equipped with Level 2 EVSE, then all can use ALMS.

9 Point Criteria Info:

18930(a) 3