Light-Duty Residential - HCD

PUBLIC COMMENT on PROPOSED BUILDING STANDARDS

For Publication in Title 24, California Code of Regulations

Name: Peter Mustacich

Date: Sept 22, 2021

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Proposed Building Standard - Title 24 Part #: Part 11

Chapter, Section #: Electric Vehicle Infrastructure: Chapter 2, Section 202; Chapter 4, Section 4.106; Appendix A4, Section A4.106

Proposing State Agency * Department of Housing and Community Development

This comment is intended for review during: <X> 45-Day Comment Period

Comment:

On behalf of the California Statewide Utility Codes and Standards Team, we want to make the state agencies aware of a report that we recently published: "**Light-Duty Electric Vehicle Charging Infrastructure Analysis for California's CALGreen Building Code.**" The report is available for download at the following link:

https://title24stakeholders.com/measures/2022-calgreen/light-duty-ev-charging-infrastructure-cost-analysis/

This report documents data and information provided to California Air Resource Board (CARB) staff as they considered proposals for 2022 CALGreen light-duty EV charging infrastructure requirements for multifamily and nonresidential buildings. The report includes a comparison of EV-infrastructure requirements from 37 local jurisdiction reach codes across California, an EV charging infrastructure cost study comparison from previously published reports, and a summary of existing building EV requirements from local reach codes and select international codes. Finally, recommendations for future code updates are presented, including load shaping to align charging with renewable generation, futureproofing considerations to reduce retrofit costs, improving technical power requirements, considerations for incorporating automatic load management systems, accommodating variations in dwell-times, and filling data gaps to support future code enhancements.

9 Point Criteria * 18930(A) 3

Light-Duty Nonresidential - BSC

PUBLIC COMMENT on PROPOSED BUILDING STANDARDS

For Publication in Title 24, California Code of Regulations

Name: Peter Mustacich

Date: Sept 22, 2021

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Proposed Building Standard - Title 24 Part #: Part 11

Chapter, Section #: Electric Vehicle Infrastructure: Chapter 2, Section 202; Chapter 5, Section 5.106; Appendix A5, Section A5.106

Proposing State Agency * California Building Standards Commission

This comment is intended for review during: <X> 45-Day Comment Period

Comment:

On behalf of the California Statewide Utility Codes and Standards Team, we want to make the state agencies aware of a report that we recently published: "**Light-Duty Electric Vehicle Charging Infrastructure Analysis for California's CALGreen Building Code.**" The report is available for download at the following link:

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This report documents data and information provided to California Air Resource Board (CARB) staff as they considered proposals for 2022 CALGreen light-duty EV charging infrastructure requirements for multifamily and nonresidential buildings. The report includes a comparison of EV-infrastructure requirements from 37 local jurisdiction reach codes across California, an EV charging infrastructure cost study comparison from previously published reports, and a summary of existing building EV requirements from local reach codes and select international codes. Finally, recommendations for future code updates are presented, including load shaping to align charging with renewable generation, futureproofing considerations to reduce retrofit costs, improving technical power requirements, considerations for incorporating automatic load management systems, accommodating variations in dwell-times, and filling data gaps to support future code enhancements.

9 Point Criteria * 18930(A) 3

Medium- and Heavy-Duty Nonresidential - BSC

PUBLIC COMMENT on PROPOSED BUILDING STANDARDS

For Publication in Title 24, California Code of Regulations

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Proposed Building Standard - Title 24 Part #: Part 11

Chapter, Section #: Electric Vehicle Infrastructure: Chapter 2, Section 202; Chapter 5, Section 5.106

Proposing State Agency * California Building Standards Commission

This comment is intended for review during: <X> 45-Day Comment Period

Comment:

On behalf of the California Statewide Utility Codes and Standards Team, we want to make the state agencies aware of a report that we recently published: **"Medium- and Heavy-Duty Electric Vehicle Charging Infrastructure Cost Analysis for Title 24, Part 11 (CALGreen).**" The report is available for download at the following link:

https://title24stakeholders.com/measures/2022-calgreen/medium-and-heavy-duty-ev-charging-infrastructure-cost-analysis/

This report documents data and information provided to California Air Resource Board (CARB) staff as they considered proposals for 2022 CALGreen Medium- and Heavy-Duty (MHD) EV charging infrastructure requirements. The report reviews the regulatory landscape for EV charging infrastructure and outlines the proposed requirements to enable impactful opportunity charging for visiting MHD EVs at loading spaces for grocery, retail, and warehouse building types. A benefits and cost analysis featuring nine scenarios shows that these proposed requirements meet the public benefit purpose of accelerating the electrification of MHD transportation to address GHG reduction and air quality improvement priorities by preparing buildings to host a minimum level of EV charging infrastructure. Further, the new construction requirements will help avoid potentially much more expensive retrofit costs to install the same equipment in the future. The report concludes with recommendations for future work to increase scope and close data gaps.

9 Point Criteria * 18930(A) 3