**HCD Part 11 (California Green Building Code)**

**Items #4 and #5: Chapter 4, Sections 4.106.4.2.1 and 4.106.4.2.2**

**Residential EV Charging Standards**

**Comments submitted on behalf of:**

* **California Building Industry Association**
* **California Apartment Association**

**Comments submitted by:** Robert Raymer, PE and Chris Ochoa

1215 K Street, Suite 1200

Sacramento, CA 95814

(916) 812-1900

The California Building Industry Association (CBIA) and the California Apartment Association (CAA) **strongly support** the updates to the residential EV-Charging building standards submitted by the Department of Housing & Community Development (HCD).

HCD has done an excellent job of balancing the need to advance the Administration’s aggressive decarbonization goals with the need to provide affordable housing. As you can see in Items #4 and #5, HCD is making significant changes to the EV-charging building standards for new multifamily buildings by:

* Deleting the 20-unit threshold which triggers a more stringent set of standards
* Deleting the longstanding option of “EV-capable,” which required the installation of an empty conduit connecting the electrical panel to the parking space and having enough available capacity at the panel to allow for the later installation of an EV-charging receptacle.
* Significantly increasing the stringency of the standards by requiring 40 of the parking spaces to be “EV-Ready” and 10% of the parking spaces to provide Electric Vehicle Charging Stations (EVSE).

This change marks a quantum leap in the provision of EV-charging for multifamily buildings and, once again, will serve as the most stringent statewide EV-charging stand for apartments in the country.

However, it should also be noted that HCD is moving forward while significant, non-building code issues must be addressed by manufacturers, other agencies, and utility companies.

* **Durability:** It is unclear how the durability and usability of the EV-ready receptacles will fare over time. We understand that this is an emerging problem in the non-residential sector. The industry will work with the EV-charging advocates to keep track of this issue and will return to HCD with proposed modifications in a later code cycle if need be.
* **Cost-Recovery:**  While there is certainly a cost impact associated with these standards, it remains unclear how building owners and managers will recoup these costs. Will they be passed along to all renters, including those without electric vehicles, or will it be borne by only those who use these facilities? And the same concern applies to the cost of the electricity used by those with electric vehicles. Given past practice, the State Legislature and the Public Utilities Commission will ultimately decide on this issue, which will likely take years to address.
* **Grid Impact:**The Administration’s decarbonization goals include the electrification of the transportation sector and the electrification of new and existing buildings. This will present significant challenges for electrical grid reliability. Testimony provided to the CEC by utilities on May 9th indicated it could easily take 4-7 years to plan, get approval and install a new substation. And this estimate did not include any delays associated with supply chain issues (transformers and other electrical devices).

Lastly, we understand that EV advocates would like to see HCD provide an alternative method of compliance wherein builders would have the option of installing a level of “EV-Ready” parking spaces that is equal to or greater than the total number of apartments (e.g., 100%). While there isn’t enough time left in this Intervening Code Cycle to accomplish this and pass it through the robust public process with which agencies must comply. CBIA and CAA look forward to the next triennial code cycle, where HCD and all interested parties will have adequate time to consider this alternative method of compliance.