

March 8, 2019

John Couture, Chair Massachusetts Board of Building Regulations and Standards  
Kerry Dietz, Vice Chair Massachusetts Board of Building Regulations and Standards  
*Via email at [j.couture@town.sutton.ma.us](mailto:j.couture@town.sutton.ma.us) ; [kerryd@dietzarch.com](mailto:kerryd@dietzarch.com)*

Dear Chair Couture, Vice Chair Dietz, and BBRS Members,

As leaders from the electric utility, union, independent business, and non-profit sectors, we are writing in favor of proposed amendments regarding electric vehicle (EV) charging spaces (“EV Ready Spaces” or “EV-readiness”) to the 2018 Massachusetts building code. We believe the adoption of an EV-readiness provision will be beneficial to consumer costs, energy efficiency and conservation, and public safety.

1. **Promotion of energy conservation and public safety:** By statute, the BBRS is empowered to adopt building standards that promote “energy conservation and public safety” (M.G.L. ch. 143, § 95). EV-readiness is compatible with both energy conservation and public safety. EVs are more energy efficient than internal combustion engines, and reduce consumption of petroleum while improving air quality. Even based on today’s electric grid sources, these plug-in vehicles are already much lower in GHG emissions than combustion-engine vehicles. As we shift to more renewable sources of electricity over time, EVs become even cleaner. The inclusion of uniform baseline standards for charging infrastructure in the building code will also increase structural, fire and electric safety.
2. **Cost-effectiveness:** The authorizing statute of the BBRS identifies as a general objective the adoption of “modern technical methods, devices and improvements which may reduce the cost of construction... over the life of the building” (M.G.L. ch. 143, § 95). Designing and constructing a new building to accommodate EV-charging equipment is significantly less expensive than retrofitting an existing building. This is true whether it is a residential single or multi-family unit or commercial building. Reports conducted by agencies and institutions (including the U.S. Department of Energy and California Air Resources Board) suggest installing EV charging access at the time of construction would avoid substantial retrofit costs.
3. **Practicality:** In 2017, the Massachusetts Legislature authorized the BBRS to include requirements for electric vehicle charging for residential and appropriate commercial buildings to the building code. As the growth of electric mobility continues to gain momentum, the need for large-scale EV charging networks is becoming more pressing.

Over 80% of charging events happen at home, and EV drivers will also need access at work and other common driving destinations, yet a lack of access to charging exists today in multi-unit dwellings, workplace, and commercial locations.

4. **Growing Need:** Construction requirements for EV-Ready Spaces have been widely adopted in building codes in locations including California, Georgia, Washington, Michigan, Ohio, and Canada. EV parking spaces provide employees, customers, and the public at large an additional incentive to work, shop, recreate and live in areas that support EV drivers with convenient charging. Given the growing number of EV drivers and overall electrification of transportation, this is becoming increasingly important to municipalities and businesses.

Additionally, the proposed amendments set aside reasonable exceptions to EV charging installations, including circumstances where the existing electric service capacity is not available for such installations, or where the use or location of the parking spaces makes it not necessary to provide EV charging access. The proposed amendments would ensure a smooth transition to increased EV use with minimized costs of impacts.

Thank you for taking our comments into consideration.

Sincerely,

James W Hunt III, Senior Vice President Regulatory Affairs and CCO, Eversource Energy

Tedd Saunders, CSO, Saunders Hotel Group

H.G. Chissell, Founder/CEO, Advanced Energy Group, LLC

Joe Casey, Business Agent, International Brotherhood of Electrical Workers

Amy Laura Cahn, Senior Attorney, Conservation Law Foundation

Larry Chretien, Executive Director, Green Energy Consumers Alliance

Deb Pasternak, Chapter Director, Massachusetts Sierra Club

Emily Lewis, Senior Policy Analyst, Acadia Center

Carol Oldham, Director, Massachusetts Climate Action Network

Marty Nathan, Climate Action Now

Dan Gatti, Senior Transportation Analyst, Union of Concerned Scientists

Peter O'Connor, Policy Specialist, Plug In America

Chris Dempsey, Director, Transportation For Massachusetts