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October 26, 2018

The Honorable Mary Nichols
Chair, California Air Resources Board
1001 I Street
Sacramento, CA 95814

Re: Electrify America Cycle 2 ZEV Investment Plan – SUPPORT

Dear Chair Nichols,

The California Building Industry Association (CBIA) is a statewide trade association representing over 3,400 member-companies involved in residential and light-commercial construction. CBIA member-companies are responsible for over 90% of the new single-family dwellings built in California each year.

Electrify America's Cycle 2 ZEV Investment Plan appears to be a very thoughtful plan on how best to achieve California's aggressive ZEV goals. CBIA strongly supports Electrify America's efforts to play a key role in efficiently establishing an EVSE network in key areas of the state.

Regarding residential construction, CBIA would like to suggest a slight enhancement to the proposal which might assist in a more cost-effective "targeting" of residential structures as the program moves forward.

Background:

Because of AB 1092 (Levine 2013), the Department of Housing & Community Development (HCD) was directed to propose EV-Ready building standards for adoption by the Building Standards Commission. HCD performed this regulatory task in very short order and starting on July 1st, 2015, all new homes in California have been required to be "EV Ready". Specifically, a larger electrical panel is required to be installed with enough empty plug slots to allow for the later installation of EVSE. In addition, the home also has an empty conduit leading from the electrical panel to a designated point in the garage. As opposed to older homes without these features, the labor costs of installation of EVSE in a new home built post July 1st, 2015 is significantly less as there is little or no need for a carpenter to break-out and repair the wall in the garage or for an electrical to install a larger (or separate) electrical panel. Similar requirements have been required in larger apartment complexes.

Suggestion:

Focusing on getting fully functioning EVSE into these newer homes and apartments would be an extremely cost-efficient way to quickly and cheaply increase the number of EVSE across the state. In addition, many of these projects were built in jurisdictions requiring a certain number of units to be made available for below-market rate buyers/renters.

CBIA is affiliated with a network of local BIA regional offices located throughout the state. Working with these offices and the building departments in these areas would be an easy way to identify homes and apartments having these cost-saving modifications.