Dear TAG Members -

A couple of comments on the draft.

1. 429.4.1 EV Capable parking spaces begins by saying: "A listed raceway capable of accommodating a minimum 40-ampere dedicated 208/240-volt branch circuit shall be installed."

Then it says "Raceways and related components that are planned to be installed underground, and in enclosed, inaccessible or concealed areas and spaces, shall be installed at the time of original construction." As I read this, it suggests that the other raceways - those that are not planned to be underground, or in difficult spaces - don't have to be installed at the time of original construction. I think it would be clearer if it read:

"Any components related to the raceway that are planned to be installed underground, or in enclosed, inaccessible or concealed areas and spaces, shall also be installed at the time of original construction."

2. As I read the draft, it will result in half the required spaces (the EV-Ready ones) delivering 40 amps, and will allow the other half of the spaces (the EV-Capable ones) to load share in the long run. Having some of the spaces provide a relatively large amount of power, and having some of them provide a workable minimum, seems like a promising idea to me, at least for situations without dedicated parking. This might allow drivers to get significantly more range at their multifamily residence or at work from one set of chargers on the somewhat unusual days when they need that, and provide an adequate minimum in the other set of spaces for the ordinary days when adding 20 miles or so at 16 amps is perfectly adequate.

3. Re Group A, E, and M occupancies

As far as I can see, the Legislature's intent in not exempting employee parking in these buildings was clearly to provide usable workplace charging infrastructure for people who will actually be parked at the buildings for 8 hours, without requiring it for people who will only be there for a couple of hours at most. Given that, I don't think that one EV-Ready Space and one EV-Capable Space for every 200 parking spaces is nearly adequate for the E and M occupancies. As I imagine this, we're talking about questions like how many workplace EV parking spaces we expect to need over the next twenty or thirty years for the teachers and staff at a high school, or for the workers and managers at a department store or a supermarket. (As an example, the neighborhood Safeway a couple of miles from my house has something less than 200 parking spaces. As I read the draft, it would only have been required to have one EV-Ready space and one EV capable space; that doesn't seem as if it will be enough to me, leaving aside the fact that some customers might use the chargers sometime, and that we'd like to have some available when people came to work.) I think that the ratio of teachers and staff to spaces at a high school of college is considerably higher.

3. Re 429.4.4 - accessible parking spaces

As I read the draft, having an accessible EV-Ready space serve "adjacent spaces" as well would require larger circuits than 40 amps for those accessible space, since the EV-Ready space always has to supply 40 Amps. (I expect it would be possible to have a load-sharing setup that supplies power to the adjacent spaces if and only if the accessible space isn't drawing its 40 amps, but I don't know if that would be worth the trouble and expense.)

Best wishes,
Thad Curtz