

Building Industry Association of Washington 300 Deschutes Way SW, Ste. 300 Tumwater, WA 98501 (360) 352-7800 | BIAW.com

June 14, 2022

BFP Standing Committee 1500 Jefferson St SE Olympia, WA 98501

RE: Proposal 091 – EV Charging

Dear BFP Committee,

The Building Industry Association of Washington (BIAW) gives a voice to 8,000-members that represent builders, remodelers, skilled trades professionals and their associates who help Washington families enjoy the American dream of owning a home. We are writing today in opposition to Proposal 091 – EV Charging. This proposal was passed onto the BFP Committee by the International Residential Code Technical Advisory Group and we respectfully dissent in that recommendation.

Mandating that each new home constructed in Washington (only in instances with a carport or garage) include a circuit to allow electrical vehicle charging seems simple on the surface but many complications can arise. For example, if the electrical infrastructure cannot support an additional circuit and improvements have to be made, large investments would have to be made by either the electrical utility or the builder. This will either impact the upfront cost of homes (and homes within new subdivisions) or impact electrical rates paid by all utility customers. Per anecdotal evidence provided by member companies, these costs can be upwards of \$20,000.

Further, builders are already including circuits for EV charging in most new homes in the state, largely fueled by consumer demand. The only exceptions are when the electrical infrastructure upgrades make putting these circuits in economically infeasible for both the builder and the homebuyer.

Lastly, this code change does not fit the purpose or objective of state building codes. Please refer to RCW 19.27.020, "to promote the health, safety and welfare of the occupants or users of buildings and structures and the general public by the provision of building codes throughout the state."

We respectfully request the BFP Standing Committee remove this proposal from further consideration by the full State Building Code Council.

Sincerely,

Andrea Smith
Policy & Research Manager
Building Industry Association of Washington