From:	DES SBCC
To:	Curb, Dustin (DES)
Subject:	FW: EV Charging Comments
Date:	Monday, May 12, 2025 1:29:19 PM
Attachments:	image001.png image002.png image003.png image004.png image005.png image006.png image007.png

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From: Patrick Hanks <patrickh@biaw.com>
Sent: Wednesday, May 7, 2025 11:42 AM
To: Roger Heeringa <rheeringa@dci-engineers.com>; Todd Beyreuther <beyreuther@masstimber.systems>
Cc: DES SBCC <sbcc@des.wa.gov>
Subject: EV Charging Comments

External Email

Hello,

I have been discussing the BFRW Committee's draft EV charging proposal with a couple of our members who build large multifamily projects. Overall, shifting more of the requirements to EV capable while removing the requirement for EV Capable to be included in sizing for the electric service are huge improvements to the current code. However, there is still room for further improvements that we hope the committee will consider including, as follows.

- Setting different rates based on local adoption and anticipated adoption of EVs (county or zip code level). This may be challenging to implement but is highly requested by our builders who find that the needs for EV charging vary drastically across the state.
- Making so the transformer sizing doesn't have to be for simultaneously charging all spaces. Provide the option for sizing to be adjusted as utilities get a better idea of what is needed. Other electrical loads in buildings are typically calculated assuming they will not all be used simultaneously. As utilities get more information on charging habits it's possible that load requirements can be reduced.
- Provide an exception for if the utility cannot provide 100% of power for the requirements. Allow buildings to put in what utility can provide and convert any unmet EV installed or EV ready to EV capable. This will make it, so we are still installing a large amount of EV charging infrastructure while not delaying housing production due to electrical supply issues.

- Clarifying that if a building exceeds one category that it can count towards a lesser category (excess EV charging stations count towards EV ready requirements, and so on). Makes it so that buildings aren't penalized for going above code.
- Allow R-2 occupancies to calculate requirements based on dwelling units instead of parking spaces. Makes it so multifamily housing won't have to put in more EV spaces than there are dwelling units. Or a disproportionate amount for smaller multifamily buildings.
- Our members suggest changing the language for 429.3 to (if no changes are made to simultaneous charging requirements):

  > "The electrical service and electrical system, including any on-site distribution transformers, shall have sufficient capacity to simultaneously charge all EV Charging Stations and EV Ready parking spaces at 40-amperes each, or 16 amperes each if an Automatic Load Management System is provided."

I tried communicating with Chair Beyreuther multiple times since the last BFRW committee to discuss this at more length, but we were unable to connect. We appreciate the committee's efforts to listen to stakeholder feedback on section 429 and are optimistic about the direction the proposal is headed. Looking forward to improving this section for the 2024 code. I'm happy to answer any questions or discuss these topics further.

Thanks,
Patrick

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