

TESTIMONY REGARDING SB 627
being heard by the Maryland Senate Education, Health, and Environmental Affairs Committee
on Tuesday, February 15, 2022 at 1:00 PM

Dear Chair Pinsky, Vice Chair Kagan, and Members of the Committee:

Thank you for the opportunity to provide input on SB627, State Building Code - Electric Vehicles, which builds upon the tremendous work this legislature did last year in passing HB 784 to also include commercial, multi-family residential, and mixed-use buildings, in addition to single-family residential buildings. This bill will make Maryland a regional leader in utilizing the State Building Code to account for the need to develop robust electric vehicle charging infrastructure throughout the state to support the growth of electric vehicles. By passing this bill, Maryland will demonstrate its support for increasing accessibility to electric vehicles through reducing the cost for electric vehicle charging infrastructure.

Tesla's mission is to accelerate the world's transition to sustainable energy through the deployment of electric vehicles (EV), EV charging, and energy storage solutions and solar. To date, Tesla has delivered more than two million EVs globally. This experience gives us unique insight into what it takes to deploy electric vehicles at volume and which policy mechanisms are most effective in furthering adoption.

Maryland has an ambitious goal of 300,000 zero emission vehicles on the road by 2025. To meet this goal, it is important to develop policies that encourage EV adoption, including those that make it easier to deploy charging equipment in commercial, residential, and mixed-use parking lots. SB 627 would codify the latest best practices for EV building codes and reduce the cost of EV charging in new buildings. Retrofitting an existing building with the necessary electrical infrastructure to support an EV charger is 4-6 times more expensive than if completed during new construction.¹ In particular, residents of existing multi-family buildings often face significant obstacles to cost effectively retrofit their buildings. For those living in multi-family buildings, the additional cost to upgrade the electrical panel, install conduit between the electrical panel and their parking space, and the logistical challenges of securing building owner or ownership association approval, make it often nearly impossible or cost prohibitive.

Tesla suggests two minor amendments to the bill that incorporate model EV-ready code language being developed in the International Energy Conservation Code committees with input from a robust number of industry, government, environmental, and building stakeholders. These also remove requirements, such as the 40 ampere and 208/240 volt specifications, from the actual definitions and move them more appropriately into the body of the code requirements.

- Amend the definition of EV-Capable Parking Space in 12-205(A)(5) to: "EV-capable parking space" means a designated parking space that is provided with electrical infrastructure, such as, but not limited to, raceways, cables, electrical capacity, and panelboard or other electrical distribution equipment space, necessary for the future installation of an Electric Vehicle Charging Station.
- Amend the definition of EV-Capable Parking Space in 12-205(A)(5) to: "EV-ready parking space" means a parking space that is provided with a branch circuit and either an outlet or receptacle, that will support an installed Electric Vehicle Charging Station.

Thank you for the opportunity to provide this testimony.

Zach Kahn
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¹ <https://caletc.aodesignsolutions.com/assets/files/CALGreen-2019-Supplement-Cost-Analysis-Final-1.pdf>