December 9, 2022

Vermont Public Service Board
112 State Street
Montpelier, VT 05620

Re: EV Readiness in Building Energy Standards Update

Renewable Energy Vermont (REV) appreciates the opportunity to comment on the ongoing efforts to update Vermont's Commercial and Residential Building Energy Standards. As a state, our capacity to meet our climate goals rests heavily on the rapid electrification of our transportation and thermal sectors. REV applauds the Department's proactive efforts to prepare Vermont's building stock for this transition.

Incorporating strong EV Ready parking requirements and standards in both the CBES and RBES is a vital step to supporting widespread electrification. Access to convenient and reliable charging opportunities is essential for consumer adoption of EVs. Currently, most charging occurs at home, and ensuring that new single and, especially, multi-family properties have access to home charging will be a key factor for promoting equitable EV adoption opportunities. Ensuring that charging opportunities are readily available at commercial buildings will further facilitate EV adoption and provide for greater flexibility in when and where vehicles charge. As we electrify an increasing share of the economy, utilizing EVs as flexible sources of the load has potentially significant system advantages. These advantages stand to benefit vehicle owners, distribution utilities, and Vermont ratepayers alike. Standards that prepare new residential and commercial buildings for EV charging will have significant benefits for advancing our climate goals, promoting equitable access to the benefits of electrification, and building a robust and resilient grid.

The cost of installing charging infrastructure during a building retrofit is substantially higher than during new construction, as much as four times higher according to a report prepared for the California Electric Transportation Coalition, ChargePoint, and Tesla.[i] EV Ready codes such as those currently proposed, that result in expanded breaker panels, conduit, and wire access at parking spots will reduce the cost and complexity of making EV infrastructure widely available. REV strongly supports the EV readiness standards that have been proposed and encourages the Department to adopt them as drafted.

Sincerely,

Jonathan Dowds
Deputy Director

[i] Energy Solutions (2019). *Plug-In Electric Vehicle Infrastructure Cost Analysis Report for CALGreen Nonresidential Update* https://caletc.com/assets/files/CALGreen-2019-Supplement-Cost-Analysis-Final-1.pdf