

December 9, 2019

Chair and Council Members
Planning and Land Use Management Committee
200 North Spring Street
Los Angeles, CA 90012
clerk.plumcommittee@lacity.org

Re: Adoption of Los Angeles EV-Ready and EV Charging Building Standards Ordinance - File No. 17-0309 - SUPPORT

Dear Chair and Council Members:

On behalf of a coalition of the leading EV charging companies and service providers, we submit this letter to express our strong support for building code modifications that will increase the electric vehicle (EV) readiness requirements for new construction buildings in the City of Los Angeles (LA). We commend the Committee and its members for their leadership in advancing transportation electrification. The currently proposed building code local amendments are a great first step that with minor changes can make a material difference in helping Los Angeles fulfill its vision to “increase the percentage of electric and zero emission vehicles in the city to 25% by 2025; 80% by 2035; and 100% by 2050.”¹

ChargePoint is the world’s leading electric vehicle (“EV”) charging network, with charging solutions for every charging need and all the places EV drivers go: at home, work, around town and on the road. ChargePoint features over 105,000 independently-owned places to charge, including more than 7,000 in the City of Los Angeles. Drivers on the ChargePoint network plug into a charging station every 2 seconds. ChargePoint drivers have completed more than 70 million charging sessions, avoided 83 million gallons of gasoline, and driven more than 1.9 billion gas-free miles.

EVCA is a non-profit trade association representing twelve electric vehicle service providers (EVSPs), software and equipment manufacturers, and installation and maintenance providers. Our members include American Building Management, Blink Charging, BTCPower, ChargePoint, Clean Fuel Connection, Envision Solar, EVBox, EV Connect, EVgo, Flo, Noodoe, and Volta. EVCA’s mission is to advance the goal of a clean transportation system in which the market forces of innovation, competition, and consumer choice drive the adoption of EVs and deployment of charging infrastructure.

EVgo operates America’s largest and most reliable public EV fast charging network, with more than 1,200 DC Fast Chargers across 34 states and an active customer base of 180,000 customers.

¹ LA Green New Deal Plan, p. 80, https://plan.lamayor.org/sites/default/files/pLAn_2019_final.pdf

Based in West LA, EVgo is proud to currently operate 250 public fast chargers and counting as well as the nation's first hybrid-public and rideshare fast charging hub in the LA market. Today, 80% of Californians live within a 15-minute drive of an EVgo charger.

Greenlots is a Los Angeles-based provider of electric vehicle charging technology and services, including the award-winning SKY network software platform. Greenlots' charging solutions are built around an open standards-based focus on future-proofing while helping site hosts, utilities, and grid operators manage dynamic EV charging loads and respond to local and system conditions. Greenlots has over 75 employees and contractors locally, and has been actively deploying charging infrastructure for the City since 2015.

Tesla is an American manufacturer of advanced electric vehicles and battery energy storage systems with the mission to accelerate the world's transition to sustainable energy. Today, Tesla is one of the largest manufacturing employers in California with nearly 20,000 employees in the state, including more than 10,000 at Fremont where all Tesla vehicles are assembled, including Model 3, which is designed and built as the world's first mass-market electric vehicle. As a manufacturer of EVs, Tesla has a direct interest in transportation electrification and associated EV charging infrastructure issues. As of July 2019, Tesla has deployed 1,683 supercharger charging stalls at 120 locations in California and 14,081 supercharger charging stalls at 1,604 locations globally. Tesla has also deployed 2,300 Level 2 wall connectors at 900 destination charging locations in California.

In April 2019, Mayor Garcetti released LA's Green New Deal, which set a goal of decarbonizing LA's transportation sector, and fully electrifying all vehicles in the city by 2050. Additionally, in January 2018, Governor Brown set additional goals for transportation electrification in California including 5 million zero-emission vehicles (ZEVs) on the road by 2030 and the deployment of 250,000 electric vehicle chargers, including 10,000 direct current fast chargers, by 2025. This represents a significant increase from the current deployment of more than 600,000 EVs and plug-in hybrid vehicles. New buildings have an increasingly key role to play in meeting these and future transportation electrification targets but the levels of EV infrastructure currently required in new construction are not nearly sufficient for meeting these goals. Since the majority (~80%) of charging thus far occurs at home or at work, ensuring that Level 2 charging is generally available in residential and workplace parking structures provides a needed sense of reliability and convenience for current and future EV drivers across all communities in California.

A minimum of 20% EV-Ready spaces is needed

Many cities around the state have already recognized that the CALGreen code requirements for EV readiness at 10% of multifamily buildings (effective Jan 1, 2020) and 6% for commercial buildings may not be nearly high enough to meet statewide ZEV deployment goals. These cities have passed local stretch codes to require that between 20-25% of new multifamily or commercial parking spaces are built with either complete circuits or at least critical elements of EV readiness to meet current demand and provide flexibility to meet future demand.

The proposed ordinance to increase the EV-ready requirement for MUDs to at least 20% is therefore consistent with what other cities across California have already adopted and what will be recommended per Tier 2 under the CALGreen code. Even at higher required levels of EV-capability, this represents a

minimal amount of total construction costs, usually at less than 1%, which was demonstrated via cost effectiveness assessment for the statewide code update. Furthermore, the requirement that 80% of spaces at new MUDs include raceway for future EV charging is also important as it drives critical cost savings as EV adoption increases and more than 20% of spaces need to have charging access.

Consider a DC Fast Charging compliance pathway for new non-residential development

With regard to commercial buildings, increasing the percentage of spaces required for EV chargers and EV readiness is critical, as is allowing flexibility for commercial buildings to meet those obligations through Level 2 (L2) or Direct Current Fast Charger (DCFC) infrastructure. As fast chargers are able to serve more drivers than an L2 charger by delivering more range per charge, there is a strong use case for fast charging in commercial and multi-family developments.

We strongly recommend that the Committee modify the draft proposal to include the ability to use the equivalency of 1 DCFC for 5 L2 chargers in setting minimum commercial targets.

Given that new building stock will be in use well beyond 2050, the Committee should consider 20% to be a floor and evaluate significantly higher levels of penetration, especially when paired with options to mix charging types.

Continuing to increase EV ready requirements is necessary

Requiring some level of EV charger installation may be beneficial and should be done simultaneously while continuing to increase the percentage of EV readiness requirements for new construction. We support increasing the requirement for EV-ready parking spaces for new construction to at least 20%. The 20% capacity requirement provides a balance between up-front spending and long-term avoidance of retrofit costs. Under this scenario, buildings would be outfitted to support additional EV drivers beyond the 20% figure, with minimal additional cost. Specifically, a 20% minimum allows for an entire parking garage of EVs to charge at once, within a reasonable timeframe, using basic load management software (~3 hours to fill the national daily commute of 30 miles and up to 10 hours for a 100 to 200-mile charge, depending on the number of cars). Any lower capacity than 20% will result in sub-optimal charging times and may prevent future EV-owning residents and building owners/landlords from undertaking the additional retrofits required to add needed additional charging capacity.

Additionally, enabling commercial buildings to deploy a mix of L2 and DCFC infrastructure will enable those entities to optimize both in terms of customer needs/use case and to minimize direct cost impacts through public/private partnerships with charging providers.

EV readiness requirements are a critical tool to support the state's ambitious climate, EV, and EV charging deployment goals. We sincerely appreciate the City of LA's efforts to support EV adoption and future charging station deployment by updating its building code.

Thank you for your consideration,

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CC: Councilmember Marqueece Harris-Dawson, Chair
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