

From: Zemel, Felix (DPS)
Sent: Tuesday, June 14, 2016 1:59 PM
To: Carley, Stephen (DPS)
Subject: Fwd: Proposed Code Changes

Felix I. Zemel
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Technical Director / Acting Chief of Inspections -- Building
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Sent from my iPhone. Please excuse any errors and/or typos.

Begin forwarded message:

From: John Falacci <[redacted]>
Date: June 14, 2016 at 1:57:22 PM EDT
To: "Felix I. Zemel" <[redacted]>
Cc: John Falacci <[redacted]>
Subject: Proposed Code Changes

Felix I. Zemel, MCP, MPH, CBO, RS, DAAS
Department of Public Safety
Technical Director / Acting Chief of Inspections -- Building
Boston, MA 02108

After careful review of the proposed requirement referenced above I wish to express some concerns. I am opposed to the adoption of the provision for the reasons stated below.

1. Authority

It is my opinion that the proposed requirement referenced above does not fall under the scope of the powers and duties of the BBRs as provided by M.G.L. ch. 143, sections 94 and 95. It is unrelated to the BBRs's mandate of life safety/public safety and does not provide for energy conservation of the home.

2. Cost

The majority of new single family and two-family homes are built with a 200amp electrical service in which the entire panel is in use. A provision that mandates an open 40amp slot be provided would more often than not require either the addition of a sub-panel or an upgrade to the electrical service to 300amps, an additional cost of approximately \$1,000.

3. Applicability

It is extremely likely that the vast majority of those who purchase an electric vehicle, either now or in the near future, will live in an existing structure that is highly unlikely to have an electric vehicle charging station. Consumers who choose to purchase an electric vehicle do so with the full knowledge that it will someday need to be recharged and will make the necessary changes to their home. It is in most cases no more expensive to add an electric vehicle charging station to an existing home than to a new home.

Further, as other technologies such as fuel cells advance, the demand for electric vehicles may never reach the level that seems to be assumed by the proposed mandate.

Regarding new single family homes - Builders are very responsive to the market and the demands of their customers. They will provide electric vehicle charging stations voluntarily as demand escalates. The current demand for electric vehicle charging stations is extremely low but if it does increase, builders will quickly prepare their homes with the necessary infrastructure as part of their normal standard features.

4. Summary

In short, it makes no sense to require electric vehicle charging station infrastructure in new 1 and 2 family homes when it will add cost to the home, may never be used, and is easily added post-construction if the homeowner chooses to do so. Furthermore, as noted above, the BBRS does not have it within their powers and duties as authorized by the Legislature to issue such a mandate as part of the Building Code.

Your consideration of my opposition is most appreciated.

Regards,

John Muir Falacci, Project Manager
Bayswater Development, LLC