

Draft Comments for submission to DOER pertaining to the documents cited below.

- 225\_CM\_22\_MA\_Residential\_low-rise\_redline\_06-24-22 [225 CMR 22]
- 225\_CM\_23\_MA\_Commercial\_redline\_06-24-22 [225 CMR 23]

#	Section	Comment
1		The cited documents both propose definitions pertinent to electric vehicles and EV charging to be added to the cited documents respectively.
1.1	225 CMR 22 Ch.2 [RE] Sect R202 p.3	<p>Definitions proposed for ELECTRIC VEHICLE and ELECTRIC VEHICLE SUPPLY EQUIPMENT (EVSE) are not consistent with definitions of these same terms already published in MGL Ch. 25A Sect. 16. The definitions for ELECTRIC VEHICLE SUPPLY EQUIPMENT (EVSE) closely conforms to the definition of this term already published in 527 CMR 12.00 MA Electrical Code (Amendments) sect 625.2.</p> <p>We recommend adjusting the definitions in 225 CMR 22 Sect R202 to more closely conform to those already published in MGL Ch. 25A Sect.16, while remaining consistent with those already published in 527 CMR 12.00 Sect. 625.2.</p>
1.2	225 CMR 22 Ch.2 [RE] Sect R202 p.3	<p>Definition proposed for ELECTRIC VEHICLE CHARGING SPACE (“EV Ready Space”) is not consistent with definitions and usage of similar terms related to electric vehicle charging already in broad use. Specifically, the abbreviated form (“EV Ready Space”) is very similar to a term in broad use (“EV Make-Ready Space”) leading to potential confusion.</p> <p>We recommend adjusting the terminology used in 225 CMR 22 Sect R202 to more closely conform to prevailing usage, e.g., “EVSE Equipped Space.”</p>
1.3	225 CMR 22 Ch.2 [RE] Sect R202 p.3	<p>Zoning Bylaws and/or zoning ordinances published for other jurisdictions introduce the terminology “EV Make-Ready Space” to refer to vehicle parking spaces equipped with the infrastructure necessary to support EV charging other than the EVSE equipment itself.</p> <p>We recommend adding the term “EV Make-Ready Space” defined as:</p> <p>“A vehicle parking space equipped with the infrastructure necessary to support electric vehicle charging, other than the EVSE equipment itself, to facilitate future installation of EVSE without costly refit. EVSE “Make-Ready” infrastructure includes space and capacity within the electric supply panel to accommodate future EVSE in 100% of the spaces so designated, and electrical raceways or conduit of sufficient size that are continuous from the supply panel to the designated location(s).”</p>
1.4	225 CMR 23 Ch.2 [CE] p.4	<p>Definition proposed for ELECTRIC VEHICLE, ELECTRIC VEHICLE SUPPLY EQUIPMENT (EVSE) are not consistent with definitions of these same terms already published in MGL Ch. 25A Sect. 16. The definition for this term closely conforms to the definition of this term already published in 527 CMR 12.00 MA Electrical Code (Amendments) sect 625.2.</p> <p>We recommend adjusting the definitions in 225 CMR 23 Ch.2 to more closely conform to those already published in MGL Ch. 25A Sect.16, while remaining consistent with those already published in 527 CMR 12.00 Sect. 625.2.</p>

#	Section	Comment
1.5	225 CMR 23 Ch.2 [CE] p.4	<p>Definition proposed for ELECTRIC VEHICLE CHARGING SPACE (“EV Ready Space”) is not consistent with definitions and usage of similar terms related to electric vehicle charging already in broad use. Specifically, the abbreviated form (“EV Ready Space”) is very similar to a term in broad use (“EV Make-Ready Space”) leading to potential confusion.</p> <p>We recommend adjusting the terminology used in 225 CMR 22 Sect R202 to more closely conform to prevailing usage, e.g., “EVSE Equipped Space.”</p>
1.6	225 CMR 23 Ch.2 [CE] p.4	<p>Zoning Bylaws and/or zoning ordinances published for other jurisdictions introduce the terminology “EV Make-Ready Space” to refer to vehicle parking spaces equipped with the infrastructure necessary to support EV charging other than the EVSE equipment itself.</p> <p>We recommend adding the term “EV Make-Ready Space” defined as:  “A vehicle parking space equipped with the infrastructure necessary to support electric vehicle charging, other than the EVSE equipment itself, to facilitate future installation of EVSE without costly refit. EVSE “Make-Ready” infrastructure includes space and capacity within the electric supply panel to accommodate future EVSE in 100% of the spaces so designated, and electrical raceways or conduit of sufficient size that are continuous from the supply panel to the designated location(s).”</p>
2	The cited documents both propose new requirements for EV related parking spaces equipped to provide charging to electric vehicles.	
2.1	225 CMR 22 Ch.4 [RE] Sect R404.4 pp.8-9	<p>New requirements for wiring of Electric Vehicle Charging Spaces (“EV Ready Spaces”) specifically require that all spaces for 1 &amp; 2 family dwellings and town homes and 20% of spaces required for all other R-use buildings be fully equipped with EVSE and terminating in NEMA receptacle or SAE Standard J1772 electrical connector.</p> <p>We recommend that consideration be given to amending the requirement for all other R-use buildings such that some portion of the requirement can be met by “EV Make-Ready Spaces” (see Comment 1.3 above)</p>
2.2	225 CMR 23 Ch.4 [CE] Sect C405.13 &C405.13.1 pp.26-27	<p>New requirements for Electric Vehicle Ready Parking Spaces (“EV Ready Spaces”) (Mandatory) specifically require that 20% of spaces required for Group R and Group B occupancy classifications and 10% of spaces required for all other occupancy classifications be fully equipped per the definition for EV Ready spaces noted above.</p> <p>We recommend that consideration be given to amending these requirements such that some portion of the requirement can be met by “EV Make-Ready Spaces” (see Comments 1.6 above)</p>