

August 12, 2022

Massachusetts Department of Energy Resources
100 Cambridge Street, Suite 1020
Boston, MA 02114

Subject: Joint Comment Letter Regarding Stretch Code Straw Proposal

Dear Secretary Card, Commissioner Woodcock, and Director McCarey:

We write as the Zero-Emission Vehicles (“ZEV”) Coalition to provide comment on the proposed Stretch Energy Code and Specialized Stretch Code Draft Regulation, released on June 24, 2022. We understand that this proposal represents lengthy work from the Department of Energy Resources (“Department”) and appreciate that it will help push our Commonwealth closer to a decarbonized future. After reviewing the initial and updated straw proposals, the ZEV Coalition has concerns surrounding electric vehicle (“EV”) charging provisions. EVs, combined with public transit and mode shift, represent a crucial portion of our transportation future, and it is absolutely critical to get these details correct as we move our Commonwealth forward and work to meet the greenhouse gas emissions reduction mandates.

The lack of sufficient charging infrastructure remains one of the biggest barriers to EV adoption. The Massachusetts Clean Energy and Climate Plan for 2025 and 2030 (“CECP”) calls for 75,000 public charging stations across the state by 2030. Currently we have fewer than 5,000. The EV infrastructure requirements in building codes is a crucial policy lever to maximize access to affordable charging options at home and work and minimize costs for residents and businesses. The ZEV Coalition has identified the following areas of concern and potential improvements:

- Residential “low-rise”: The initial Stretch Code and Net Zero Code straw proposals called for 10% and 20% of parking spaces to be EV ready, respectively. The current proposals set both of these figures at 20%. Though this is an improvement on the initial proposal, it still falls short of what is needed. Under these proposals, a 5-unit residential building with five parking spaces would only have a single EV ready parking space. We strongly recommend that 100% of parking spaces in multi-family dwellings be EV ready

and 25% of parking spots be equipped with electric vehicle charging stations. This requirement is already in place in some cities, such as Vancouver.

- Direct Current Fast Charging (“DCFC”) parking spaces: The draft code language for the Stretch Code and Specialized Code for Commercial Buildings requires that “Group R and Group B” new commercial buildings make at least 20% of their parking spaces with wiring to accommodate the future installation of charging stations. However, the list of exceptions for this include any building that provides two or more parking spaces with DCFC. An example of how this may play out and the concerns surrounding this provision is that 2 DCFC parking spaces are not an adequate replacement for 40 level 2 EV-ready parking spaces in a 200-unit apartment building with 200 parking spaces. The ZEV Coalition recommends that the Commercial Stretch Code and Specialized Opt-in Code exception for DCFC be modified to allow for one DCFC parking space as a substitute for five level 2 EV-ready parking spaces.
- Commercial buildings (includes multi-family residential over 12,000 square feet): The initial Stretch Code and Net Zero Code straw proposals provided little detail on metrics for EV ready parking spaces. Thankfully, the current proposals provide specifics, with 20% of parking spaces required to be EV ready in multi-family residential and “business use” buildings for both codes, similar to the residential “low-rise” proposal. As stated previously, this figure is far too low. We recommend that 25% of parking spots in new commercial construction should be equipped with charging stations and an additional 25% of parking spots be EV ready. Additionally, the category of “business use” is far too broad, and includes business such as office parks, barber shops, post offices, and banks. The use and time spent at each of these locations varies dramatically, and EV ready parking spaces should be allocated differently based upon these distinctions.
- Technical concerns: These proposals include rigorous analysis on the building’s side to display how specific HERS ratings were determined. However, there appears to be little to no analysis provided to support the decisions relative to the number of EV ready parking spaces. The ZEV Coalition urges that information be publicly available.

The ZEV Coalition appreciates the opportunity to submit these comments. If you have any questions or concerns, please do not hesitate to reach out to Kyle Murray (KMurray@acadiacenter.org).

Sincerely,

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