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Electric Vehicle Charging Association Docket Comments No 25-BSTD-03 â€“ 2028 Energy Code Pre-Rulemaking

Additional submitted attachment is included below.

November 5, 2026
California Energy Commission
715 P Street
Sacramento, CA 95814

Re: Electric Vehicle Charging Association Docket Comments No. 25-BSTD-03 – 2028 Energy Code Pre-Rulemaking

Dear Commissioner McAllister and Staff,

The Electric Vehicle Charging Association (EVCA) appreciates the opportunity to provide our comments on the 2028 Energy Code Pre-Rulemaking. We greatly appreciate CEC staff's work in revising and updating energy efficiency standards.

The Electric Vehicle Charging Association (EVCA) is a non-profit trade association representing the leading companies in the electric vehicle charging industry, including charging network providers, equipment manufacturers, software providers, and EV manufacturers.

In the draft proposed updates to the 2028 Energy Code, Staff proposes exemptions for direct current fast charging (DCFC) electric vehicle service equipment (EVSE) from non-residential lighting requirements. The draft excludes lighting illuminating DCFC EVSE from automatic scheduled lighting requirements as long as they conform with the motion sensing requirements.[1] [2] The draft also provides an extended vacancy time-delay of up to 30 minutes, rather than 15 minutes, for lighting illuminating DCFC EVSE.[3]

While we appreciate these modifications, we are still concerned about the impacts of these requirements on drivers' experience and safety. Even with the proposed 30-minute vacancy delay, lighting at a site open 24/7 would still dim by 50 to 90 percent whenever stalls are vacant, so the next driver may arrive at a dimmed site. This matters because DCFC sites are unstaffed, involve payment transactions, and are often used at night. As a result, drivers need a safe, illuminated path between their vehicle, the charging cables, and the payment kiosk. The appearance of an unlit or dimmed site could deter drivers from charging at a station or driving an EV at all, undermining driver confidence in public charging and EV adoption. Consequently, this could impact the State's ability to achieve its transportation electrification goals.

Furthermore, sufficient lighting can play an important role in deterring vandalism and cable theft. A 2026 Cybersecurity and Infrastructure Security Agency (CISA) cross-sector alert warns that criminal actors are increasingly targeting EV charging stations nationwide for their copper wiring.[4] These crimes impact charger reliability and consumer confidence as cut cables and damaged equipment take stalls offline, reducing the number of working chargers available to

drivers. Experienced charging operators understand the risks at each location and rely on layered measures to protect their sites. While well-lit sites may still be impacted by vandalism and cable theft, the absence of sufficient lighting may encourage even more vandalism and cable theft.

Existing standards already recognize that lighting needs vary with site-specific security conditions: ANSI/IES G-1-22 recommends higher illuminance for open parking areas where security is an issue,[5] and the Energy Code allows additional lighting power for retail parking with special security needs.[6] For these reasons, operators should have the flexibility to use lighting as part of a site-specific security strategy.

To address these concerns, we recommend that the CEC exempt lighting illuminating DCFC EVSE from both the automatic scheduling control requirements and the motion-sensing reduction.

We appreciate the CEC's efforts to seek stakeholder feedback in this code cycle and look forward to engaging further to ensure a safe, secure, and accessible charging network for all California drivers.

Signed,



Reed Addis
Governmental Affairs
Electric Vehicle Charging Association

Notes

[1] "Exception 1 to Section 601.2.3.2.2: For Nonresidential Buildings excluding Group R occupancies, lighting illuminating DC Fast Charging EVSE (DCFC EVSE) controlled by motion sensing controls in accordance with Sections 601.2.3.2.3(2), 601.2.3.2.3(4) and exception to Section 601.2.3.2.3(3) and have demonstrated compliance with NA7.8.1 Motion Sensing Controls Acceptance Tests." at pages 6-25 – 6-26.

[2] "Motion sensing controls shall be capable of reducing the outdoor lighting power of each controlled luminaire by 50 to 90 percent, and separately capable of turning the luminaire OFF, during unoccupied periods." at page 6-26.

[3] "Exception to Section 601.2.3.2.3(3): Motion sensing controls for lighting illuminating DC Fast Charging EVSE (DCFC EVSE) excluding Group R occupancies shall be permitted to reduce the lighting to its dim or OFF state no longer than 30 minutes after the area has been vacated." at page 6-26.

[4] Cybersecurity and Infrastructure Security Agency, Cross-Sector Alert on Copper Wire Theft from EV Charging Stations (as of March 2026),

https://www.cisa.gov/sites/default/files/2026-05/CISA_Copper%20Wire%20Theft_Fact%20Sheet_508.pdf.
[5] Illuminating Engineering Society, ANSI/IES G-1-22, Guide for Security Lighting for People, Property, and Critical Infrastructure §§ 8.7, 8.14.4 (2022), https://store.ies.org/product/g-1-22-guide-for-security-lighting-for-people-property-and-critical-infrastructure/.
[6] Cal. Code Regs. tit. 24, pt. 6, § 140.7(d)2 & Table 140.7-B (2025 Energy Code, eff. Jan. 1, 2026); see also Cal. Energy Comm'n, 2025 Nonresidential and Multifamily Compliance Manual, Outdoor Lighting chapter, https://www.energy.ca.gov/filebrowser/download/8657?fid=8657.