

DOCKETED

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*Comment Received From: Bradley Groters
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EV Connect Comments on Permitting

Additional submitted attachment is included below.



RE: Streamlining the EV Charger Permitting Process
Docket #: 17-EVI-01

September 4, 2019

To whom it may concern:

Established in 2009, EV Connect is the home of the most innovative and robust cloud-based software platform for managing electric vehicle (EV) charging stations. Our mission is to provide the most flexible, open, and standards-based cloud platform for managing the EV charging ecosystem. Aligned with our mission, we support practical policies and programs that advance the deployment of EVs and create a robust and interoperable EV charging network.

We greatly appreciate the work of the Commission and other state agencies to streamline the permitting process for EV charging stations. While there has been recent progress, we believe there is room for improvement in several areas:

High Level Codes and Standards – State-level codes exist but are up to the interpretation of the individual plan checker, city planner, and final inspector. That discretion is not formalized and varies greatly between jurisdictions. This often leads to misinterpretations and misperceptions of what should be engineered on drawings. Because there is no “one rule applies to all”, most times multiple intakes and reviews are required, adding additional cost and time to the project.

Furthermore, there is no defined timeline for plan review. AHJ’s are not required to review drawings within a certain amount of time, e.g. 2 - 4 weeks. In markets like Northern California where there’s currently an abundance of work and a lack of labor, the initial review can take up to 8 – 10 weeks with no comments provided to the contractor during that time. This lack of visibility of the review process often frustrates contractors, network providers, and ultimately the site host.

- **Solution:** Define reasonable timelines for AHJ to review plans and provide comments and feedback.

ADA Compliance – By far the most time and resource consuming piece in obtaining permit approval statewide. Again, what is and isn’t code compliant is up to the AHJ’s interpretation, meaning we cannot apply the same treatment to all designs.

Furthermore, because there are no exceptions to ADA compliance (or the jurisdiction’s opinion of what is ADA compliant), the overall scope and cost of a project can change drastically. For example, the City of Santa Monica required 7 multi-unit dwellings, all in the same one block residential complex, to provide a single port EV charger at one ADA parking spot at each building. When it was determined that one of the buildings only had enough power to support ONE single port station, the AHJ required that one port be ADA accessible. The only station that was installed at the site was placed at an ADA parking spot, rendering it inaccessible to the residents and ultimately frustrating the site host.

- **Solution:** Allow for “common sense” solutions and exceptions based on case-by-case site layouts, use cases, and demographics of site.

Streamlined Process and Accountability – Similar to the lack of clear direction regarding codes and compliance, there is also no defined approval process or accountability to streamline comments. For example, the City of Santa Monica, a self-titled “Green City”, does not assign projects to one person with the City. Every time plans were resubmitted, they went to a new plan checker that did not have visibility on the previous comments provided by the previous plan checker. This led to inconsistent feedback at each intake with varying requests by each city plan checker. Each site required 5 to 8 intakes over the course of 6 months.

- **Solution:** Assign one dedicated plan checker and point of contact at City to review plans. This allows for contractors to streamline feedback and ensure plans are compliant per that specific plan checker’s comments. Also keeps all parties accountable during review process.

Existing Violations – Burdens for electrical contractors performing EVSE installations. For example, previous owners at a site in Milpitas, CA had installed showers without a permit before current property owner purchased property 5+ years ago. When the contractor applied for permit to install Level 2 EVSE’s, it was determined that the site was already in code violation for the unpermitted work.

The course of action was to then submit plans and obtain a new permit for the existing violations, perform work to rectify violations, pass final inspection, and then begin the EVSE permitting process. Given the 12 – 16 estimated weeks to address the existing violations, the site was abandoned entirely

- **Solution:** Allow for submittal of a waiver that lets contractors permit and perform EVSE installation while site host addresses existing issues. Site host would be required to address violations within a certain timeframe.

Jurisdiction – Final jurisdiction regarding compliance varies by City and Municipality. Had multiple cases where plan checker issued permit and once EVSE’s were installed, the final inspector would not approve installation as their discretion contradicted what was permitted by initial plan checker. The action was for the contractor to uninstall and relocate stations and restore site back to original state, increasing the overall project cost and completion timeline and aggravating site host.

- **Solution:** Require cities to align teams and provide clear consensus between planning departments and final inspectors.

Best Practices to Consider

- **EV Charging Counter** – City of Burbank has expedited EV charging by instituting a permitting counter to review EV charging plans and permits. Given plans are compliant, a permit could be issued within 10 working days of first intake.
- **Over-The-Counter Permit Approval** – Encourage all cities to have at least one day of the week when contractors can schedule in-person reviews and receive over-the-counter permit approval. 90% of AHJ’s in California do not have OTC reviews or approvals, allowing for additional misinterpretation of comments and code requirements when project scope is complex.
- **Expedited Permit Services** – Some cities have “premium” permit services which allows expedited review of plans for an additional cost. Service is particularly helpful for projects with short runways to execute.



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We appreciate the opportunity to provide comments on the EVSE permitting process. If you have any questions, please contact me at (202) 394-2804 or bgroters@evconnect.com.

Best,

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