



August 18, 2020

International Code Council
2019 Group B Appeals Board
500 New Jersey Avenue, NW
6th Floor
Washington, DC 20001

RE: CE217 Parts I and II Appeal

Members of the ICC 2019 Group B Appeals Board,

Tesla appreciates the opportunity to provide comments on the appeal of CE217 Parts I and II, which pertain to electric vehicle charging infrastructure in residential and commercial buildings. In submitting these comments today, Tesla urges the Appeals Board to uphold the outcomes of the 202 voting process.

Tesla's mission is to accelerate the transition to sustainable energy through the development of all-electric vehicles and clean energy products including photovoltaic solar and battery storage. Since the company's inception, it has manufactured more than one million all-electric vehicles. Tesla has also deployed extensive charging infrastructure networks including direct current fast charging, the Supercharger Network, and Level 2 charging, the Destination Charging Network. Globally, there are nearly 27,000 Destination Chargers deployed and more than 2,000 Supercharger stations and over 18,000 total Supercharger charging stalls.

We firmly believe that transportation efficiency measures are within the scope of the energy codes and standard and are already addressed in existing energy code and standards such as in ASHRAE. The IECC 2018 and 2021 Sections C405.8, C407.1, and R406.3 already include language that address transportation systems and their energy usage. Transportation efficiency measures, including those for electric vehicles charging infrastructure, are within the scope of existing precedent for energy codes and standards.



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The requirements in CE-217 Parts I and II, will result in a reduction of total system energy usage, as plug-in electric vehicles reduce the amount of total system energy usage as compared to internal combustion engine vehicles. Additionally, the requirements also result in a reduction of the total installation cost of electric vehicle charging infrastructure by requiring investment during construction when the costs are four-to-six times less than in a retrofit. This code change adequately future proofs residential and commercial buildings for electric vehicles at the lowest total cost and reduces total system energy usage.

Tesla appreciates the opportunity to comment on the appeal of CE217 Parts I and II and urges the Appeals Board to uphold the outcome of the 2021 voting process which approves CE217.

Respectfully submitted,

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