

**BEFORE THE NEVADA ENERGY COMMISSIONER**  
**COMMENT/REPLY COMMENT INFORMATION FORM**

**Rulemaking to adopt, amend, or repeal )  
regulations pertaining to Chapter 701 )  
of the Nevada Administrative Code related )  
to the conservation of energy in buildings, )  
including manufactured homes, adoption )  
of 2009 IECC pursuant to Nevada Revised )  
Statutes 701.220. )  
\_\_\_\_\_ )**

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**NOV 08 2010**

**RENEWABLE ENERGY AUTHORITY  
CARSON CITY, NV**

**Please complete the following information and submit this form along with your comments<sup>1</sup>:**

**Date of Filing: 7 November 2010**

**Method of Filing: via Email  U.S. Postal Mail   
Fax**

**Name of Person Commenting: Bob Tregilus**

**Name of Organization (if applicable): Electric Auto Association  
of Northern Nevada**

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**Do you wish to be placed on the email service list for this matter to receive any further notices? (Mark One)**

**Yes  No**

**Note: Submitted comments are part of the public record for the rulemaking and may be posted on the web.**

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<sup>1</sup> Please refrain from making any changes to this form. Thank you.

**REPLY COMMENTS OF THE  
ELECTRIC AUTO ASSOCIATION OF NORTHERN NEVADA  
IN REPLY TO COMMENTS POSTED IN NOTICE OF REQUEST FOR COMMENTS REGARDING  
ADOPTION OF 2009 INTERNATIONAL ENERGY CONSERVATION CODE (IECC)-  
(NRS 701.220)**

COMES NOW Electric Auto Association of Northern Nevada ("EAANN"), and hereby submits reply comments ("Reply") to the Nevada Energy Commissioner ("Commissioner") and the Nevada Renewable Energy and Energy Efficiency Authority ("Authority") regarding the rulemaking to adopt, amend, or repeal regulations pertaining to Chapter 701 of the Nevada Administrative Code ("NAC") related to the conservation of energy in buildings, including manufactured homes, pursuant to Nevada Revised Statutes ("NRS") 701.220, dated, 7 October 2010 ("Notice").

The Commissioner has requested replies to Notice comments regarding the adoption of the 2009 version of the International Energy Conservation Code ("Code") and "other factors which will affect the use of energy in a building" as well as "electrical equipment and systems."

**DISCUSSION**

Unfortunately, the Code is proprietary information, and not freely available for public review, so the EAANN is unable at this time to determine if any Electric Vehicle Service Equipment ("EVSE") standards and best practices are included in the Code.

However, if the Commissioner and Authority are considering the adoption of the Code and the Code lacks provisions for the installation, future post-construction installation scalability, and retrofit of existing construction with EVSEs the EAANN would like to offer the following observations and recommendations for the Commissioner's and Authority's consideration.

Nearly every automaker in the world--and all of the major vehicle manufacturers, both private and commercial--are planning, or beginning to produce, plug-in electric vehicles ("EV"). A survey of EV industry literature reveals EV adoption rate estimates over the next decade vary widely. However, even the low estimates suggest building standards and public code authorities must begin the adoption of provisions and best practices to enable cost effective EVSE installation or scalability in all new construction as well as incentives for post-construction EVSE additions, including electric service equipment ("ESE") upgrades.

## **RECOMMENDATIONS**

If the Commissioner and Authority are considering the adoption of the Code and the Code lacks standards or best practices with regard to EVSEs the EAANN recommends that the following outlines for amendments be considered for inclusion in NAC whether the Code is eventually adopted or not.

- Provide infrastructure for EVSEs in 20 percent of parking stalls in all new multi-unit residential buildings, and make allowances for future upgrades by providing empty ducts and conduits.

- The electrical room in a multi-family building, or in the multi-family component of a mixed use building, that in either case includes two or more dwelling units, must include sufficient space for the future installation of the ESE necessary to provide scalability to accommodate the use of EVSEs in 100 percent of the parking stalls that are for use by owners or occupiers of the building.
- Develop a strategy for retrofitting existing buildings that explores the use of incentives to encourage the installation of EVSE infrastructure in existing buildings, parking stalls, and parking lots.
- Review amount and nature of EVSE infrastructure annually over the next 5 years with the development community, and other stakeholders, to ensure that EVSE infrastructure supports current needs and future demands.

#### **CLOSING COMMENT**

Unfortunately, only today did the EAANN become aware of this Notice, hence, the EAANN is unable to treat this Notice as it pertains to EVSEs with the requisite detail necessary to do justice this topic.

But because Nevada authorities have not until very recently considered that as automakers add plugs to their products--effectively merging transportation with buildings--Nevada has been relegated to the bottom of the list by all automakers with regard to test markets and viable introductory markets for their initial plug-in transportation

offerings. This oversight has the advantage, however, of having effectively buying Nevada a full year to develop and adopt policies that support the emerging EV industry.

The EAANN respectfully submits this Reply to Notice on this 7th day of November 2010.



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