



November 13, 2025

Dear members of the Construction Codes Advisory Council,

Drive Electric Minnesota is a partnership of Minnesota's electric vehicle (EV) champions, dedicated to encouraging the deployment of EVs and the establishment of EV charging infrastructure through public-private partnerships, financial incentives, education, technical support and public policy. Drive Electric Minnesota and our partners believe EVs are an important component of energy efficiency and cleaner transportation in Minnesota that is both financially and environmentally sustainable.

Whether motivated by sustainability, financial savings, or other factors, more consumers are making the switch to EVs. **Minnesota's EV market has grown tremendously over the past five years, reaching 7% of the new passenger vehicles sales last year with over 100 models available for consumers.** There are now over 78,000 EVs on the road in Minnesota, with two-thirds of those being fully electric (i.e. plug only). These are supported by around 2,700 public charging ports across the state, with more to come through state, federal, and utility funds.

EVs bring many well-documented benefits, from lower operating costs, to back-up power for homes and appliances, to less energy wasted in the motor itself: while internal combustion engines lose a staggering 80% of their energy, EVs only lose about 10%. making them an extremely efficient technology.

EVs also bring a change in how consumers drive and refuel, which requires adaptation in the built environment. Public charging may be rapidly expanding, but the simplest, most economical place to recharge is almost always at home. In fact, about 80% of EV charging happens at home. **As experts, industry participants, and advocates, we know the ability to charge at home easily and quickly is a major factor for new EV buyers.** This will continue to be the case as more Minnesotans make the switch to EVs – a trend that is expected to continue despite temporary federal policy uncertainty.

The EV market is here to stay. **But the decisions we make now will make it easier or harder for Minnesotans who make the switch to an EV in the years to come.** Retrofitting residential homes to support Level 2 charging – a type of faster, higher-power charging that enables many Minnesotans to access cheaper overnight electricity from their utility – is often an unexpected and expensive cost to new EV buyers. Given the significance of these costs as a barrier to at-home charging, limited state and utility funding have been made available to help defray retrofit costs, but those funds are an incomplete solution.

The permanent, most efficient and most affordable solution is installing Level 2 charging at home during new construction.

Installing the conduit and wiring (“EV capable”) or the conduit, dedicated circuit, and junction box/outlet (“EV Ready”) to support Level 2 charging is a preferred approach and well understood by the market. However, installing conduit alone, as provided by the Code Change Proposal before the CCAC, avoids the most expensive part of retrofitting. Requiring *at least* the conduit for Level 2 charging in new residential construction would be a significant step forward in reducing unnecessary costs for EV drivers. This small action upfront will only add a couple of hundred dollars to a new home cost but will save homeowners several thousand dollars down the road.

For these reasons, Drive Electric Minnesota and the undersigned organizations urge the Construction Codes Advisory Council to adopt the requirement to build at least the conduit to support Level 2 charging for EVs in new residential homes as part of the next Residential Construction Code.

The new era of EVs means a new chapter in how our homes interact with our transportation needs. Adopting this code change proposal will help make sure Minnesota stays on top of this transformation and meets consumers where they are.

Sincerely,

Drive Electric Minnesota

Alliance for Transportation Electrification

Connexus Energy

Dakota Electric Association

Fresh Energy

Shift2Electric