ALLIANCE FOR AUTOMOTIVE INNOVATION

December 25, 2025

Ms. Theresa Smith, Hearing Officer
Department of Natural Resources and Environmental Control
Office of the Secretary
89 Kings Highway
Dover, DE 19901

Re: Auto Innovators supports the 2101 Regulations for the State Energy Conservation Code

Dear Ms. Smith,

Thank you for the opportunity to comment on the Department of Natural Resources and Environmental Control (DNREC) update to regulations for the State Energy Conservation Code.

The Alliance for Automotive Innovation (Auto Innovators) represents the full auto industry value chain, including the manufacturers producing most vehicles sold in the U.S., equipment suppliers, battery producers, semiconductor makers, technology companies, and autonomous vehicle developers. Our mission is to work with policymakers to realize a cleaner, safer, and smarter transportation future and to ensure a healthy and competitive auto industry that supports U.S. economic and national security. Representing over 5 percent of the country's GDP, responsible for supporting nearly 11 million jobs, and driving $1.5 trillion in annual economic activity, the automotive industry is the nation's largest manufacturing sector[1].

Auto Innovators strongly supports DNREC's proposal to require new one- and two-family dwelling units and townhouses to be EV ready or have an EVSE space, as well as requiring 20% of dwelling units or parking spaces at mixed use buildings with residences to be EV ready or have EVSE spaces. These requirements support EV adoption by making it easier for consumers to install home charging.

Plug In America, a national EV driver nonprofit, showed in its 2025 Driver Survey that nearly 36 percent of respondents were concerned about charger availability when purchasing an EV[2]. Nearly 35% were concerned about charger reliability, which was a 3 percent increase from the 2024 survey[3]. Our members also hear these concerns directly from prospective EV consumers.

Access to home charging drives EV adoption by alleviating these concerns[4]; it's simple, convenient, and reliable. Home charging offers many benefits (especially if it is level 2 charging): It's typically cheaper to install, cheaper to operate than public chargers, and is usually less impactful to the grid, especially if it's part of a demand response program or utility time-of-use rate. Drivers can also "set it and forget it" after they come home from work. And by having a full charge every day, drivers save time from having to track down public chargers.

[1] **Alliance for Automotive Innovation.** (n.d.). *Resources and insights.* https://www.autosinnovate.org/resources/insights
[2] Plug In America. (2025). *EV Driver Survey.* Retrieved from https://pluginamerica.org/wp-content/uploads/2025/06/2025-EV-Driver-Annual-Survey-Report-1.pdf. Page 12.
[3] *Id.*
[4] Lopez, T., & Jarvis, M. (2022). *Zero-Emission Vehicle Infrastructure Plan (ZIP)* (Publication No. CEC-600-2022-054-REV). California Energy Commission. Page 33. https://www.energy.ca.gov/sites/default/files/2022-12/600-2022-054-REV.pdf

The following quote from an EV driver in California reinforces this point[5]: “just knowing that you will have a fully functioning car the next day, that’s going to safely get me to work and back, without having spent any money on gas and without having to wait at a gas station…as I get older time is more valuable so all that time adds up”.

As of 2024, the state had nearly 8,500 EVs on the road and expects that number to increase to approximately 205,000 by 2032[6] in support of its climate goals. Robust charging infrastructure will be critical to realizing this future. Therefore, we strongly support DNREC’s proposed regulations.

Thank you for your consideration,

Cory Bullis
Director, Energy & Environment Policy
Alliance for Automotive Innovation

[5] Bullis, C. (2022, September 22). *There’s no place like home (to charge your EV).* FLO. https://www.flo.com/insights/theres-no-place-like-home-to-charge-your-ev/
[6] Delaware Department of Transportation. (2022, July). *Delaware electric vehicle infrastructure deployment plan.* Page 1. https://deldot.gov/Programs/NEVI/pdfs/DE%20EV%20State%20Plan%20Report_Final.pdf