



October 3, 2022

Ms. Gina Roccaforte  
Division of Legal Counsel  
Illinois Environmental Protection Agency  
1021 North Grand Avenue East  
P.O. Box 19276  
Springfield IL 62794-9276

Dear Ms. Roccaforte:

The Building Owners and Managers Association of Chicago (BOMA/Chicago) welcomes the opportunity to provide comments regarding the Charging Infrastructure Grant Rule, 35 Ill. Adm. Code 285, establishing the Charging Infrastructure Grant Program.

BOMA/Chicago is a trade association that has represented the interests of the Chicago office building industry since 1902. Membership includes 240 commercial office, institutional and public buildings and 200 companies that provide commercial building services to support operational excellence. BOMA/Chicago members constitute approximately 80 percent of all rentable office space in downtown Chicago. These valuable assets are the core of one of the world's greatest central business districts.

BOMA/Chicago is a major contributor to the economic livelihood of the city and region, housing nearly 647,000 employees and over 18,000 local businesses in our member buildings. It is estimated that BOMA/Chicago buildings inject more than \$4.6B into the Central Business District Economy and are a major supporter of local schools and public services with over a billion dollars paid in annual property taxes.

Leading the nation in green building space as noted in the last three [CBRE Green Building Adoption Index](#) publications, BOMA/Chicago also has a long record of advancing energy efficiency and sustainability practices. Through ongoing education, best practice sharing, and major investments in energy efficiency programs and technologies, BOMA/Chicago and our member buildings serve as dedicated stewards of the environment. As electrification opportunities advance, BOMA/Chicago seeks to expand sustainable practices that will reduce greenhouse emissions.

To further those efforts, BOMA/Chicago supports the State's efforts to put 1 million electric vehicles (EVs) on the road by 2030. As real estate and business leaders, BOMA/Chicago plays an important role in adopting EV infrastructure to encourage downtown workers and visitors to purchase electric vehicles and have a safe, convenient, and central place to park. To accomplish this, it is critical we have a solid infrastructure of EV chargers in strategic locations, especially in Chicago's Central Business District which serves as the central hub for all communities within the city and metropolitan region.

Providing commercial charging stations in downtown Chicago garages – both tenant and staff garages and garages open to the public – provides a convenient, central location for office workers, visitors, and tourists from every Chicago neighborhood and beyond to charge their cars during work hours. This is especially helpful for those who do not have access to charging infrastructure at home due to street parking or lack of infrastructure within their home garages. Having a reliable EV charging infrastructure in place in safe, centralized downtown locations will further incentivize residents and tourists to purchase EVs. Establishing this infrastructure as standard office building amenity would also encourage more workers to return to the office, further revitalizing the Central Business District and stimulating the state's economy.

Based on a recent survey of BOMA/Chicago buildings, it is estimated that our buildings have 56,000 total parking spaces across all member buildings. While 63% of the buildings with garages surveyed have already installed EV charging stations, the vast majority have only 5 or less charging stations – certainly not enough to meet anticipated demand. If 20% of the total parking spaces were equipped with Level 2 EV charging stations (because people visiting office buildings tend to stay for longer periods of time, Level 2 chargers with longer charging times and lower kilowatt usage are more applicable), that would add 11,000 EV charging stations into the Central Business District.

With an average cost of \$7,500 for Level 2 charging stations (not including consulting, electrical, and other related costs), the cost of adding this infrastructure on such a wide scale is significant – totaling \$82.5M to install 11,000 charging stations. Therefore, it is essential that our building members can apply to the Charging Infrastructure Grant Program for reimbursement to further serve staff, tenants, and the general public from every Chicago neighborhood and beyond.

*With this in mind, we respectfully suggest that language in Section 285.220 be changed to allow for adequate funding and focus on Level 2 chargers. Current requirements for access to “walk up” consumers, a cord manageable system, and open standard protocol would restrict access for Level 2 charging stations simply because these options are not an industry standard (as they are for Level 3 charging stations). We request that these requirements be limited to Level 3 charging stations only.*

*Level 2 charging stations have lower kilowatt usage and longer charge times and are less disruptive to ComEd's distribution network than are Level 3 charging stations with spurts of high kilowatt usage at random times. Level 2 charging stations can be deployed in greater quantities in commercial office buildings for building staff, tenants, and tourists, while providing more convenient access to a greater number of people. For that reason, we urge the Agency to support Level 2 stations within the framework contemplated by these rules.*

To place one million EVs on Illinois roads by 2030, it is critical that Chicago's Central Business District have an extensive network of safe, conveniently located EV charging stations available to support residents and tourists. Having this infrastructure in place via BOMA/Chicago commercial office buildings – a group with a long history of advancing energy efficiency and sustainability practices – will not only support existing EVs for office building staff, tenants, and the general public, it will also incentivize residents and tourists alike to purchase EVs.

Thank you again for the opportunity to submit comments.

Sincerely,



Farzin Parang  
BOMA/Chicago Executive Director