



January 26, 2022

NFPA Standards Administration
1 Batterymarch Park
Quincy, MA 02169

RE: TIA No. 1621

Dear NFPA Standards Administration:

We are writing to express our strong opposition to expediting the proposed NFPA 30-2021 Code for Motor Fuel Dispensing Facilities and Repair Garages TIA Log No. 1621 and urge the committee to vote against the Tentative Interim Amendment regarding fire codes changes related to electric vehicle (EV) chargers at motor fuels facilities.

We respect the important work this committee does to keep the public safe and the collaborative process that the NFPA brings to complex issues. But, the Tentative Interim Amendment (TIA) would be a sharp departure from this otherwise sound process. The background work receiving information from experts and studying actual experience in the retail motor fuel space simply has not been done to a sufficient level to support issuance of a Tentative Interim Amendment.

Developing reasonable and safe fire codes related to EV chargers at fuel dispensing facilities, such as gas stations and truck stops, should be done through the regular process that is underway for the code review for the 2024 version of the 30A-Motor Facilities Code. Following that process should allow for transparent and robust stakeholder input and feedback from subject matter experts from electric vehicle manufacturers, electric vehicle supply equipment manufacturers, fuel retailers, utilities, and other valuable resources. That has not occurred to date, and cannot occur in any meaningful way in the short time period permitted for committee consideration of the TIA.

No Emergency Exists

While there is a strong interest and effort to move the transportation energy sector towards electrification as quickly as possible, the consumer demand for EVs and the need to build a competitive EV charging market will not happen overnight, nor would it be prudent to unintentionally develop fire codes and standards that would unnecessarily inhibit this transition. The proposed Tentative Interim Amendment risks doing just that.

There is no substantial evidence to date of safety issues relating to charging EVs at retail fueling locations. Without that evidence, there is nothing to suggest that an emergency exists that would justify going through the TIA process rather than taking the time to go through the full process to consider the code for 2024.

No Technical Merit

There is also no evidence supporting the substance of the TIA as written. Fuel retailers have a vested interest in ensuring the safety of their customers and employees and want to be a partner with other stakeholders in making sure the EV charging experience is as safe, convenient and efficient as possible. Fuel retailers operate many EV chargers at their locations today and are adding more sites. These sites safely charge vehicles every day. The technical committee does not have information before it to support the TIA approach.

By using the process and timeline for revising the code for 2024, it would allow for greater input and better data to make the most informed decision in developing an effective fire code for EV chargers at fuel dispensing facilities.

The proposal that was just released for the TIA process does not allow enough time to gather the technical information and data needed to make a reasonable, supportable decision. To date, adequate data has not been collected, disseminated or evaluated. This is a vital step in the process that cannot be overlooked.

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In the strongest possible terms, we urge every member of the committee to oppose issuance of any TIA at this time. These issues can only be reliably handled through a full process with complete information.

Thank for your attention to, and consideration of, this matter. We look forward to working with you through a full, deliberative process.

Sincerely,

David H. Fialkov
Executive Vice President, Government Affairs
NATSO, Representing America's Travel
Centers and Truck Stops
SIGMA: America's Leading Fuel Marketers

Doug Kantor
General Counsel
National Association of Convenience
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