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chargepoint



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We, the undersigned companies and organizations, are involved in the development, installation, and operation of electric vehicle (EV) charging infrastructure across the United States. We submit this letter to the members of the National Electrical Code (NEC) Code-Making Panel 12 (CMP-12) to raise the Panel's attention to several major challenges in 2026 NEC 625.43 *Emergency Shutoff of EVSE and WPTE* that are poised to have an adverse impact on electric vehicle (EV) charging station deployment, compromise the authority of local code officials, and clash with well-established first responder training principles.

The purpose of NEC 625.43(D) is to provide an easily identifiable shutdown device for first responders during an emergency. We strongly support the intent of this section as a matter of emergency preparedness and electrical safety. However, the existing language in the 2026 NEC creates several practical challenges that undermine its purpose.

Distance requirements

The 2026 code mandates that emergency shutdown devices be located no less than 20 feet and no more than 100 feet from the equipment, in a readily accessible outdoor location within sight of both the EVSE and the service equipment. These rigid distance requirements frequently conflict with real-world site layouts, which are constrained by tight property lines, setback requirements, underground utilities, zoning regulations, required landscaping, and standard parking layouts, that push electrical equipment out more than 100 feet from the charge posts.

For example, zoning policies that include parking-space minimums often make it impossible to reduce the number of parking spaces on-site when installing EV charging; meaning, electrical equipment may not be placed within 100 feet of the posts because it would occupy space that must be preserved for a parking space. There are many such zoning site restrictions for new EV charging installations because they are typically retrofitted into existing parking facilities. It is relatively uncommon for EV chargers to be installed on undeveloped land. This means designing a site from scratch to meet the 20-100 feet distance requirement from both the EVSE and its associated electrical equipment is often not an option. The code language will also virtually eliminate the ability to install EV charging curbside; because associated electrical equipment will be inside an adjacent building and completely hidden from line of sight, there may be no compliant location for a shutdown device that is "within sight" of both the EVSE and its associated equipment.

As another issue, for very large sites, compliance with the current code may necessitate multiple scattered shutdown devices, significantly complicating project design and creating uncertainty for

first responders regarding which shutdown device controls which charging post. Under the current language, there is no flexibility to allow local fire code officials and site designers to work together to identify the best, safest location for emergency shutdown devices, further contributing to the potential for confusion and hazardous conditions for first responders in an emergency.

The language on distance requirements fails to accommodate different site configurations, unnecessarily increases complexity of shutdown systems, and is so prescriptive that it undermines its intended purpose of promoting first responder safety. If unaddressed, many potential EV charging sites will have no compliant option to situate emergency shutdown devices, rendering projects infeasible and creating an adverse impact on the EV charging market. Even more pressing, the language disempowers code officials from using their judgment to place emergency shutdown devices on a site-by-site basis.

Disconnects, emergency stops, and other shutdown devices

The 2026 language repeatedly uses the term “disconnect” to refer to emergency shutdown devices. As a result, the code could be interpreted to require a “disconnecting means” as the only allowable shutdown method and preclude the use of other listed and effective shutdown devices, such as appropriately rated emergency stop switches. This approach increases material and installation costs, particularly for high-voltage DC fast charging systems, in the form of duplicative electrical switchgear, conduit, and conductor runs to accommodate 1000V system disconnecting means.

The 2026 code also fails to recognize proven, standardized approaches for rapid shutdown used elsewhere in the NEC, such as for photovoltaic systems. Meaning, the prohibition on emergency stop switches is a departure from the simple, intuitive, and consistent shutdown means that first responders are already familiar with and trained to utilize. Allowing multiple shutdown methods, including emergency stop switches, would achieve the intended function – rapid power shutdown in case of emergency – while better aligning with existing emergency response training procedures.

Conclusion

The growth of EV adoption in the United States depends on a scalable, reliable, and safe charging network. Effective and clear shutdown capabilities for first responders are tantamount to safety. However, the broad adoption of 2026 NEC 625.43(D) will have several unintended consequences on the safety and feasibility of EV charging installations unless addressed presently by the CMP-12.

We respectfully request prompt attention of the CMP-12 on this topic to promote clearer, more consistent application of the code, enhance first responder effectiveness, reduce unnecessary costs, and accommodate the wide variety of EV charging installations.

Sincerely,

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