



A 2024 Affordable Energy Plan Commitment: Manitoba's Building Code Amendments Should Include EV-Ready Requirements

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EXECUTIVE SUMMARY

Electric Mobility Canada (EMC) welcomes the Government of Manitoba's adoption of the 2025 National Model Codes through amendments to the Manitoba Building Code, Manitoba Plumbing Code, Manitoba Energy Code for Buildings, and Manitoba Fire Code¹.

However, the proposed amendments miss an important opportunity to implement a commitment Manitoba has already made.

In its September 2024 *Affordable Energy Plan*², Manitoba committed to introducing EV-ready requirements in the Manitoba Building Code and Manitoba Electrical Code to ensure that new residential, commercial, and institutional buildings, as well as major renovation projects, include the infrastructure necessary to facilitate future EV charging and reduce installation costs.

No corresponding EV-ready provisions appear in the current package of proposed amendments.

This omission risks increasing long-term costs for homeowners, tenants, condominium corporations, businesses, and institutions. The electrical infrastructure required to support future EV charging can be installed at relatively low cost during construction but often becomes significantly more expensive once a building is complete. This challenge is particularly significant in multi-unit residential buildings, where access to home charging remains one of the most important barriers to EV adoption.

Manitoba has also committed to expanding public charging infrastructure across the province. While EMC strongly supports those investments, charging EVs at home is generally the lowest cost and most convenient for drivers. The success of Manitoba's charging network will ultimately depend on broad EV adoption, which is easier to achieve when residents have access to charging where they live.

¹ <https://engagemb.ca/2025-national-model-codes>

² https://www.gov.mb.ca/asset_library/en/energyplan/mb-affordable-energy-plan.pdf

Fortunately, Manitoba does not need to develop a solution from scratch. Québec recently adopted comprehensive EV-ready requirements through amendments to its Construction Code and Electrical Code, providing a practical and cost-effective model that prepares buildings for future charging demand while avoiding costly retrofits³.

EMC RECOMMENDATION

EMC recommends that Manitoba amend the current code package, or establish an accelerated implementation pathway, to introduce EV-ready requirements consistent with Action 6.3 of Manitoba's Affordable Energy Plan, including:

- EV-ready requirements for new residential, commercial, and institutional buildings and major renovations;
- Particular consideration for multi-unit residential buildings, where charging installation is most complex and costly after construction; and
- An implementation framework informed by Québec's recently adopted EV-ready building requirements.

By acting now, Manitoba can deliver on an existing government commitment, reduce future infrastructure costs, support consumer choice, and ensure that buildings constructed today are prepared for the transportation needs of tomorrow.

ABOUT EMC

Founded in 2006, Electric Mobility Canada (EMC) is **Canada's national EV industry association**. Our mission is to enable and accelerate the transition to sustainable electric mobility in Canada through advocacy, collaboration, education, and thought leadership, with the ultimate goal of creating a cleaner, healthier, and more prosperous future for all Canadians.

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³ https://www.publicationsduquebec.gouv.qc.ca/fileadmin/gazette/pdf_encrypte/lois_reglements/2026A/107964.pdf

1 MANITOBA HAS ALREADY COMMITTED TO EV-READY BUILDINGS

1.1 Manitoba's Affordable Energy Plan Established a Clear Direction

Building Codes ensure that buildings are safe and functional today and also that they are prepared for the needs of tomorrow. As transportation electrification continues to accelerate across Canada, access to charging infrastructure is becoming an increasingly important consideration in the design of residential, commercial, and institutional buildings.

Recognizing this, the Government of Manitoba included a specific commitment regarding EV-ready buildings in its September 2024 Affordable Energy Plan. Under Action 6.3, the Province committed to:

“Introducing ‘EV-Ready’ requirements in the Manitoba Building Code and installation standards in the Manitoba Electrical Code will ensure that new residential, commercial, and institutional construction, and major renovation projects, include the necessary infrastructure to facilitate and reduce the future installation cost for EV charging.”

This commitment reflects an understanding that preparing buildings for future EV charging is significantly more cost-effective when incorporated during initial construction than when undertaken as a retrofit years later. It also recognizes that building codes have a vital role to play in ensuring that Manitoba's building stock remains adaptable to changing technologies and consumer needs.

1.2 The Current Code Review Presents a Unique Opportunity

The current consultation on the adoption of the 2025 National Model Codes provides Manitoba with a timely opportunity to implement the commitment outlined in Action 6.3.

Because building codes are updated infrequently, decisions made during this review process will influence the design and construction of new buildings for years to come. Buildings that are constructed without provisions for future EV charging will require costly electrical upgrades, panel replacements, trenching, conduit installation, and other retrofits when charging infrastructure is inevitably needed. In many cases, these costs are ultimately borne by homeowners, tenants, businesses, condominium corporations, and building owners.

By contrast, incorporating EV-ready provisions at the construction stage typically requires modest additional investment while preserving flexibility for future charging deployment. The necessary infrastructure can be integrated into building designs before walls, ceilings, electrical rooms, and parking facilities are completed, avoiding much of the disruption and expense associated with later upgrades.

As currently drafted, the proposed amendments would modernize several aspects of Manitoba's building, plumbing, energy, and fire codes, but they leave unaddressed the Province's stated objective of ensuring that new residential, commercial, and institutional buildings are designed to accommodate future EV charging needs.

This omission represents a missed opportunity.

Every year that new buildings are constructed without EV-ready infrastructure increases the number of properties that will require costly retrofits in the future.

EMC encourages the Province to use this consultation process to begin implementing the EV-ready building requirements already contemplated in Manitoba's Affordable Energy Plan. Rather than creating a new policy objective, this would simply advance a commitment that Manitoba has already publicly endorsed.

RECOMMENDATION

Manitoba should amend the current code package, or establish a clear and accelerated implementation pathway, to introduce EV-ready requirements for new residential, commercial, and institutional buildings and major renovations, consistent with Action 6.3 of the Affordable Energy Plan.

2 EV-READY REQUIREMENTS ARE ESSENTIAL FOR AFFORDABLE AND ACCESSIBLE EV CHARGING

2.1 Home Charging Is the Foundation of EV Adoption

Access to convenient charging is one of the most important factors influencing EV adoption. Most EV charging occurs at home, where vehicles are parked for extended periods and can be charged at the lowest cost. Research consistently shows that more than 80% of EV charging takes place at home, making residential charging the primary charging location for most EV drivers.

For households with access to home charging, EV ownership is convenient and economical. Residents can charge overnight and benefit from Manitoba's low-cost electricity. By contrast, households without access to home charging must rely more heavily on public charging infrastructure, which can be less convenient, more expensive, and less predictable depending on charger availability.

Public charging and home charging should not be viewed as substitutes. Rather, they are complementary components of a successful charging ecosystem. Even as Manitoba continues to expand public charging infrastructure, ensuring access to residential charging remains essential.

Public Charging Must Be Complemented by Home Charging.

EMC strongly supports Manitoba's efforts to expand public charging infrastructure across the province. Public charging plays a critical role in enabling long-distance travel, serving drivers without dedicated parking, and increasing confidence in the transition to electric transportation.

However, public charging infrastructure and home charging serve fundamentally different purposes and should be viewed as complementary rather than interchangeable. For most EV drivers, home charging remains the primary charging solution because it allows vehicles to charge during extended parking periods, typically overnight, at the lowest possible cost. Public chargers are designed to supplement this experience, not replace it.

For residents of single-family homes, access to home charging is often straightforward. For residents of multi-unit residential buildings, however, the absence of EV-ready infrastructure can create a significant barrier to EV adoption.

This challenge extends beyond individual consumers. The long-term success of Manitoba's public charging investments will depend on continued growth in EV adoption. Public charging infrastructure requires sufficient utilization rates to support ongoing operations, maintenance, and future private-sector investment. Higher EV adoption leads to increased charger utilization, which strengthens the business case for both public and private charging deployment.

Access to home charging is one of the most important enablers of EV adoption. When residents can conveniently charge where they live, they are more likely to consider purchasing an EV and more likely to rely on the broader charging network for occasional travel and destination charging. Conversely, when charging at home is difficult or impossible, some consumers delay or forgo EV purchases altogether, reducing the pool of drivers who would otherwise use Manitoba's public charging infrastructure.

In this sense, EV-ready building requirements and public charging investments are mutually reinforcing policies. Preparing new buildings for future charging helps remove a key barrier to EV adoption, while higher EV adoption improves utilization of public charging infrastructure and strengthens the economic case for continued network expansion.

Rather than viewing EV-ready requirements and public charging programs as separate initiatives, Manitoba should consider them as complementary components of a comprehensive charging strategy. Together, they can help ensure that all Manitobans, regardless of housing type, have practical access to electric transportation while maximizing the value of public and private investments in charging infrastructure.

2.2 Multi-Unit Residential Buildings Present a Unique Challenge

The need for EV-ready requirements is particularly acute in multi-unit residential buildings (MURBs), including apartment buildings, condominiums, and other forms of shared residential housing.

According to Statistics Canada, approximately one-quarter of Manitoba households live in apartment buildings. In 2021, apartments in buildings with fewer than five storeys represented 14.5% of occupied dwellings, while apartments in buildings with five or more storeys represented an additional 8.4%, for a combined total of nearly 23% of all occupied dwellings in the province⁴.

This share is even higher in urban centres such as Winnipeg, where a sizable portion of future residential growth is expected to occur. As Manitoba seeks to address housing affordability and increase housing supply, a growing proportion of new housing will likely be delivered through medium- and higher-density residential developments.

Unfortunately, MURBs are also where charging installation is most expensive and often difficult.

Unlike single-family homes, where a homeowner may often install a charger directly from their electrical panel, multi-unit residential buildings typically require shared electrical infrastructure, coordination among multiple stakeholders, and access to common electrical rooms and parking facilities. As a result, retrofitting a completed building can be complex, disruptive, and costly.

Failure to address EV-readiness during construction risks creating long-term barriers to EV adoption for a substantial portion of Manitoba residents.

2.3 Building EV-Ready Is Far More Cost-Effective Than Retrofitting Later

The strongest argument for EV-ready requirements is simple: it is significantly less expensive to prepare buildings for future charging during construction than it is to retrofit them after occupancy.

The electrical conduit, wiring pathways, panel capacity, and related infrastructure needed to support future EV charging can be incorporated into a building design at relatively modest cost when construction is underway. Once a building is complete, however, installing the same infrastructure may require opening walls and ceilings, cutting concrete, upgrading electrical systems, and performing work in occupied parking facilities.

Installing EV-ready parking at the time of construction can be up to three to four times less expensive than retrofitting parking stalls after a building has been completed⁵. EV-ready

⁴ <https://www12.statcan.gc.ca/census-recensement/2021/as-sa/fogs-spg/page.cfm?lang=E&topic=3&dguid=2021A000246>

⁵ https://cleanenergycanada.org/wp-content/uploads/2025/03/Report_2025_MURB_V4-1.pdf, referencing <https://www.cleanairpartnership.org/wp-content/uploads/2022/05/EV-Ready-Requirements-for-Municipalities.pdf>



requirements are not an added cost so much as a means of avoiding significantly larger costs in the future.

2.4 EV-Ready Requirements Support Housing Affordability and Consumer Choice

Because EV-ready construction reduces future retrofit costs, it should also be viewed as an affordability measure.

Residential buildings constructed today will remain in service for decades. Over that period, demand for residential charging will continue to increase as consumers take advantage of the lower operating and maintenance costs associated with electric vehicles.

When buildings are not designed to accommodate charging, the eventual cost of retrofits is often borne by condominium corporations, building owners, tenants, or individual residents seeking charging access. In some cases, these costs can become a barrier that prevents residents from installing charging equipment altogether.

By ensuring that the necessary electrical infrastructure is included at the time of construction, Manitoba can help avoid these future expenses while preserving consumer choice. Residents who choose to purchase an EV in the future will be able to install charging equipment more easily and at lower cost, while those who do not wish to charge an EV will not be required to install chargers immediately.

EV-ready requirements therefore represent a practical, technology-neutral approach that prepares buildings for future demand without requiring immediate investment in charging equipment.

RECOMMENDATION

Manitoba should introduce EV-ready requirements for new residential construction, with particular emphasis on multi-unit residential buildings, to ensure that all residents can reasonably access home charging and to avoid substantially higher retrofit costs in the future.

3 QUÉBEC PROVIDES A STRONG MODEL FOR MANITOBA

Manitoba does not need to develop an EV-ready framework from scratch. Québec recently adopted comprehensive EV-ready requirements through amendments to its Construction Code and Electrical Code, creating a practical and cost-effective model that Manitoba can adapt to its own circumstances.

Québec focused on ensuring that new buildings are constructed with the electrical infrastructure necessary to support future charging deployment. This approach recognizes that preparing a building for future charging is significantly less expensive than retrofitting it later. The measures were particularly focused on multi-unit residential buildings, where charging infrastructure is often the most difficult and costly to install after construction.

3.1 Québec Chose a Practical Approach

Québec's requirements are based on a simple principle: install the necessary electrical infrastructure during construction, when costs are lowest, and allow charging equipment to be added later as demand develops.

This approach avoids imposing unnecessary upfront costs while ensuring that building owners and residents can install charging equipment in the future without major electrical upgrades or disruptive construction work.

Importantly, Québec's regulations focus on future-proofing buildings rather than mandating the immediate installation of chargers in every parking space. The objective is not to force charging infrastructure where it is not yet needed, but to avoid creating expensive barriers to future deployment.

3.2 Québec Demonstrated the Economic Case

Québec's regulatory impact analysis⁶ concluded that incorporating EV-ready infrastructure during construction is significantly less costly than retrofitting buildings after occupancy. As a result, requiring EV-ready infrastructure in new construction would generate long-term savings while preparing the province's building stock for growing demand for EV charging.

This same logic applies in Manitoba. Every building constructed today without EV-ready infrastructure will result in future retrofit costs for homeowners, condominium corporations, landlords, businesses, and institutions.

3.3 Manitoba Should Build on Québec's Example

Québec has demonstrated that EV-ready requirements can be implemented through building and electrical codes in a manner that is practical, flexible, and compatible with housing development objectives.

Manitoba has already acknowledged the value of EV-ready construction through Action 6.3 of its Affordable Energy Plan. The current code review provides an opportunity to translate that commitment into action by incorporating EV-ready requirements for new construction and major renovations.

RECOMMENDATION

Manitoba should incorporate EV-ready requirements into the Manitoba Building Code and Manitoba Electrical Code using Québec's recently adopted framework as a reference model.

⁶ <https://www.rbq.gouv.qc.ca/fileadmin/medias/pdf/Publications/francais/Analyse-impact-reglementaire-projet-de-reglement-modifiant-le-chapitre-V-electricite-du-code-de-construction.pdf>