

**From:** [Nicholas Johnson](#)  
**To:** [CBSC@DGS](mailto:CBSC@DGS)  
**Subject:** Public Comment on Item 5 of the Electric Vehicle Infrastructure, Residential, 2022 CALGreen Intervening Code Cycle  
**Date:** Monday, May 15, 2023 7:34:27 AM  
**Attachments:** [CA - Legislative Letter EV Charging Equity HCD-Final - Orange Suppoort .pdf](#)

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Dear HCD,

Orange Charger Inc. supports the tier 1 amendment to the 2024 building code to help provide more residents access to affordable, reliable, and equitable energy to charge the future transition to fully electric mobility. Orange was created from day one to bring EV infrastructure to apartments economically. Today we have over 880 units installed nationwide and are on track to hit 2000+ units installed in the next nine months.

Focusing on apt units vs. purely parking spaces and in the future should include street parking to ensure everyone has equitable access to energy to charge. By adding this amendment, we can reduce the cost burden to the property owner, in some cases, by hundreds of thousands of dollars. Orange's solution, on average, reduces the installation cost by 70% but provides 50 to 75% more parking spaces and access to charging.

I would also like to know if the HCD considers the utility's electrical substation limitation that developers encounter more and more often. As developers nationwide work with Orange, we encounter the limitation on scaling EV infrastructure economically firsthand. Many of Orange's customers are concerned about the electrification of washers, dishwashers, stoves, and EV charging to the properties they develop. Many are seeing properties squeezed by building codes and utilities, which limits the amount of power available to pull from the grid, often being told by utilities that they can't have more power. We are working on a large paper nationwide that will cover the current limitation of utility power to significant commercial developments of 50+ apartments in detail to help bring these limitations to light.

While we are far from meeting our 2035 goals of EV adoption, it's clear that over the next 6-8 years that anywhere from 40-60% of vehicles on California roads will be fully electric, and we need to ensure we have the infrastructure in place to service the state's goals equitably.

Orange is attaching the community's letter in support of the proposed comments and changes. Orange also recommends keeping the power requirements low as stated in this building code (240 volts, 20 amps minimum) to help mitigate power needs and reduce the installation cost by 70% to the property developer or owners.

Best,  
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