

**DOCKETED**

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*Comment Received From: California Professional Firefighters  
Submitted On: 7/31/2020  
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**on EVSE**

*Additional submitted attachment is included below.*



**July 29, 2020**

**To:** Commissioner David Hochschild, Chair  
Commissioner Patricia Monahan  
Commissioner Janea Scott  
Commissioner Karen Douglas  
Commissioner Andrew McAllister

**Re: Docket number: 17-EVI-01**

Dear Commissioners:

The California Professional Firefighters (CPF), state council of the International Association of Fire Fighters, representing over 30,000 career firefighting and emergency medical service personnel statewide, is writing to express strong support for requiring workforce training for the installation and maintenance of electric vehicle supply equipment (EVSE) systems or “charging stations” that are installed under California Energy Commission programs.

The safe and reliable installation of EVSE systems necessitates specialized knowledge and training. Installation of EVSE systems requires adhering to an extensive list of standards, electrical codes, and workmanship requirements. Improperly installed EVSE systems and infrastructure can result in fire, explosions, electric shock, severe damage to chargers and cars, and other hazardous situations.

According to the National Fire Protection Association or “NFPA”, fires involving electrical failures or malfunctions accounted for the highest share of civilian deaths (18%) and direct property damage (20%). EVITP trains electricians to do comprehensive assessments and calculations of existing electrical system condition and capacity to increase electrical safety and reduce fires. Firefighters put their lives on the line every day to protect people and property, and any steps that can be taken to prevent fires at their source will save lives.

In order to minimize the risk of these potentially deadly electrical fires, we support requiring installers of EVSE to have Electric Vehicle Infrastructure Training Program (EVITP) training and certification. EVITP is the only comprehensive non-profit, brand neutral training and certification available for EVSE installation, and is a well-established, regularly updated national program. EVITP was developed in 2012 in cooperation with auto manufacturers, utilities, training institutions, contractors, and other EV industry

stakeholders.

A CEC EVITP requirement will ensure that all installers of CEC subsidized EVSE projects will have the advanced training necessary to ensure safe and proper installation. The growth of green energy and the spreading popularity of electric vehicles has made it more important than ever that EVSE installations are completed by fully trained and skilled technicians. Doing so will ensure the continued growth of an important industry, as well as protect the communities where these units are installed. Additionally, as the electric vehicle industry has matured, older charging units have become available – while these more affordable units have opened access to a previously prohibitively expensive good, it is even more critical that these items are installed with expertise and care.

EVITP has been a successful requirement for numerous programs in California. SDG&E, for example, has installed over 3,000 electrical vehicle charging ports under its Power Your Drive Program with EVITP-certified electricians. EVITP is also included in the CPUC safety language, and required by the cities of Long Beach, Carson, Pico Rivera, and the Port of Long Beach in an EPIC grant from the CEC. Moreover, EVITP is required for the EVSE infrastructure installations on the Nevada Electric Highway and in federally funded installations in Columbus Ohio – winner of the National Smart Cities award. EVITP is the only EVSE training program featured in the U.S. Department of Energy Guides on EV infrastructure for public charging hosts, and for contractors.

For these reasons, we urge the Commission to require EVITP for its EVSE incentive programs without delay. EVITP is a well-established, well-vetted program that has already been thoroughly evaluated by the CPUC and numerous local agencies. The time is now for the Commission to act and include it as a requirement for CEC incentive programs.

Thank you.

Sincerely,

A handwritten signature in black ink that reads "Brian K. Rice". The signature is written in a cursive style with a large initial "B" and "R".

Brian K. Rice, President  
California Professional Firefighters