

DOCKETED

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on Support

Additional submitted attachment is included below.



July 30, 2020

To: Commissioner David Hochschild, Chair; David.Hochschild@energy.ca.gov
Commissioner Patricia Monahan; Patricia.Monahan@energy.ca.gov
Commissioner Janea Scott; Janea.Scott@energy.ca.gov
Commissioner Karen Douglas; Karen.Douglas@energy.ca.gov
Commissioner Andrew McAllister; Andrew.McAllister@energy.ca.gov

Re. Docket number: 17-EVI-01

Dear Commissioners:

On behalf of Coalition for Clean Air (CCA), I am 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.

Since 1971, CCA has worked to protect public health, improve air quality and prevent climate change. The transportation sector is the leading source of smog-forming emissions and climate pollutants. Burning fossil fuels for transportation is responsible for approximately 80% of oxides of nitrogen emissions in California and 41% of the state’s greenhouse gas emissions. To meet California’s air quality obligations and climate commitments, the state will need to implement policies which will support the mass adoption of electric vehicles. Ensuring the safety of electric vehicle charging infrastructure will be important as electric vehicles are still gaining consumer confidence.

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.

This letter supports 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. With the growth of clean transportation so critical to meeting our clean air mandates, public health goals, and GHG reduction

targets, public acceptance of, and enthusiasm for, EVs is critical. There are tens of thousands of gasoline and diesel vehicle fires annually and they rarely if ever make the news. One EV related fire – even if there are no serious injuries – is a front-page story. While not fair, that negative publicity really hurts progress towards EV acceptance and achieving California’s clean transportation goals. EVITP not only reduces risks to building occupants, emergency responders and property, it protects the reputation and integrity of the EV industry, and bolsters state policy.

An EVITP requirement is also good for disadvantaged communities. Most new EVs are expensive but used ones are becoming affordable for most Californians. Charging stations are needed in disadvantaged communities but electrical equipment in stores, homes, and apartments in these communities tend to be older with electrical systems that may not be able to reliably and safely handle EVSE loads without proper installation and component upgrades. Disadvantaged communities need installation by properly trained EVITP-certified electricians in order to reduce the risk of structure fires and electrical hazards. They deserve the most competent and safest EVSE work.

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. Most recently, EVITP was referenced in The Biden Plan To Build A Modern, Sustainable Infrastructure And An Equitable Clean Energy Future.

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 "Christopher Chavez". The signature is written in a cursive style with a long, sweeping underline.

Christopher Chavez
Deputy Policy Director