

DOCKETED

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CALeVIP Project Designs

Additional submitted attachment is included below.



September 29, 2020

To: California Energy Commission Commissioners:
Commissioner David Hochschild, Chair
Commissioner Patricia Monahan
Commissioner Janea Scott
Commissioner Karen Douglas
Commissioner Andrew McAllister

Re: California Energy Commission Docket Number 17-EVI-01

Dear Commissioners Hochschild, Monahan, Scott, Douglas, and McAllister:

Coalition for Clean Air support the California Energy Commission's proposed CALeVIP EVITP Implementation proposal with a few amendments.

A. The Scope of CALeVIP EVITP Requirements Should Mirror AB 841.

CEC staff is currently proposing that the EVITP certification requirement apply only to DCFC projects, exempting all Level 2 charger projects. Level 2 charger projects also benefit substantially from EVITP certification. Insufficiently trained electricians are likely to underestimate the potential electrical safety complications and fire risk of a level 2 installation, particularly where it is being retrofitted into an existing electrical system that is more than a few years old. Errors in the electrical industry lead to fires, often from overloaded existing electrical systems, more than sufficient reason to ensure strong workforce standards.

AB 841 addresses this risk by requiring at least one electrician to have EVITP certification on *all projects except for single-family home residential electric vehicle chargers that can use an existing 208/240-volt outlet*. AB 841 additionally requires that at least 25 percent of the total electricians working on the crew for the project, at any given time, hold Electric Vehicle Infrastructure Training Program certification if the project includes *charging ports capable of supplying 25 kilowatts or more to a vehicle*. The direct current versus alternating current distinction used in the current proposal is less important than the load draw of the charger. It is the load draw that will stress other potentially incompatible or inadequate components of a building's electrical system.

We therefore support harmonizing the scope of the proposed CALeVIP requirement to mirror AB 841 by also requiring at least one electrician to have EVITP certification on all projects except for single-family home residential electric vehicle chargers that can use an existing 208/240-volt outlet.

B. Start Date for EVITP Requirement Should Be January 1, 2021.

Staff is currently proposing that the EVITP certification apply to any CALeVIP applications moved to a “funds reserved” status on or after September 1, 2021. **We support changing that start date to CALeVIP applications moved to a “funds reserved” status on or after January 1, 2021.** There are currently over 1,600 EVITP certified electricians in California. Accordingly, there are more than enough currently EVITP certified electricians to meet even an immediate implementation of an EVITP certification requirement.

Moreover, a January 1, 2021 start date would not prevent electricians who currently do not have EVITP certification from working on these projects. EVITP training and certification only takes 20-24 hours and is easily available throughout the state. EVITP has recently commenced on-line training, with the first online class already in session, the second available for sign-up, and additional classes on the way. Actual construction of electrical vehicle charging station projects would likely not begin until at least a few months after such funds are reserved. A January 1, 2021 start date would thus provide plenty of time for other electricians to be certified prior to the actual start of work on projects subject to this requirement.

C. Amending the Proposed EVITP Policy Will Best Support California’s Goals for Clean Transportation and Infrastructure

In order to meet our state’s broad and aggressive clean transportation goals, a sufficiently trained and qualified workforce will be needed to safely and efficiently install the necessary electric vehicle charging infrastructure. Until a CEC EV infrastructure workforce training requirement is effective, Commission incentive programs actually create an economic disincentive for contractors to invest in worker training and employ qualified workers by directly rewarding contractors that cut costs by employing workers who lack advanced high technology and safety training. This slows the development of a qualified workforce and puts workers and the public at risk because improperly installed EVSE poses fire, electrocution and other safety risks. *The sooner a CALeVIP EVITP requirement is implemented, the sooner contractors will be incentivized to quickly ramp up the training of their workforce.*

These scope and timing amendments to the Commission’s proposed EVITP requirement will ensure that a rapid increase in charging infrastructure is done more comprehensively, with greater safety, and more efficiently.

The proposed EVITP requirement is also consistent with the underlying statutory authority for the CALeVIP program. CALeVIP is funded through the Clean Transportation Program, also known as the Alternative and Renewable Fuels and Vehicle Technology Program (ARFVTP) (AB 118 2007 and AB 8 2013). Among the statutory goals of the program is to “support workforce training.” Consistent with this goal, the CEC’s *2020-2023 Investment Plan Update for the Clean Transportation Program* acknowledges that “workforce training and development are critical” and outlines its efforts to invest in and help develop installation and maintenance training programs. An amended EVITP requirement would be most consistent with these goals.

We urge the commission to amend the proposal. Thank you for your consideration of our comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Christopher Chavez". The signature is fluid and cursive, with a long horizontal stroke extending from the end of the name.

Christopher Chavez
Deputy Policy Director