

**DOCKETED**

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*Comment Received From: Various Organizations, Companies, and Individuals  
Submitted On: 10/1/2020  
Docket Number: 17-EVI-01*

**Proposed CALeVIP EVITP**

*Additional submitted attachment is included below.*

October 1, 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:

We, the organizations, companies, and individuals listed below, 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.

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 - the organizations, companies and individuals listed below - urge the commission to amend the proposal. Thank you for your consideration of our comments.

Sincerely,

Carolina Martinez, Environmental Health Coalition

Katherine Garcia, Sierra Club California

Julius Cherry, Former Chief, Sacramento Fire Department

Skipp Townsend, 2<sup>nd</sup> Call

Sandy Naranjo, Mothers Out Front California

Michael Lightfoot, Dyna Electric Los Angeles

Kevin Hamilton, Central California Asthma Collaborative

Paul Cort, Earthjustice

Kirk Story, Stockmans Energy

The Honorable Patrick Kennedy, Supervisor, Sacramento County

Jim Caldwell, Former Sector Navigator, Community Colleges Chancellors Office

Fran McDermott, Sacramento Chapter, National Electrical Contractors Association

The Honorable Chris Ward, Councilmember, City of San Diego, District 3

Osha Ashworth, Former Electrical Inspector, City and County of San Francisco

Alex Lantsberg, Concerned Citizen of California

Ben Stapleton, U.S. Green Building Council Los Angeles

Chris Walker, California Association of Sheet Metal and Air Conditioning Contractors, N.A.

Sam Appel, Blue Green Alliance

The Honorable Alejandra Sotelo-Solis, Mayor, City of National City

Vince Bernacchi, Shetter Electric

The Honorable Racquel Vasquez, Mayor, City of Lemon Grove

The Honorable Steve Padilla, Councilmember, City of Chula Vista

Ryan Cross, Cross Price Electric

The Honorable Olga Diaz, City Councilwomen, City of Escondido, District 3

The Honorable Jill Galvez, Deputy Mayor/Councilmember, City of Chula Vista

James Willson, NECA Los Angeles

The Honorable Flor Nicolas, Councilmember, South San Francisco

The Honorable Rick Bonilla, San Mateo City Council member  
Board director, Peninsula Clean Energy

Kevin Johnson, Electrical Training Institute, San Diego and Imperial Counties

The Honorable Tasha Boerner Horvath, Assemblymember, Seventy-Sixth District

Chris Jensen, JM Electric

The Honorable Cori Schumacher, Councilmember, City of Carlsbad

Greg Armstrong, NorCal NECA

The Honorable Kellie Hinze, Councilmember, City of Encinitas

The Honorable David Arambula, Councilmember, City of Lemon Grove

Anthony Ausbie, Kern County Electrical Apprenticeship

The Honorable Mona Rios, Councilmember, City of National City

Glenn Arvin, San Mateo JATC

The Honorable Nicholas Segura, President, Sweetwater Union High School District

Brian Gini, Collins Electric Company

The Honorable Georgette Gomez, City Council President, City of San Diego

Rubio Rubio, On Target Electric

The Honorable Brian Maienschein, Assemblymember, Seventy-Seventh District

Brad Kirk, Sacramento Valley Electric

Andy Berg, San Diego Electrical Contractors Association

David Shankle, Southern Sierra Chapter, NECA

Peter Chursin, San Francisco Electrical Apprenticeship

The Honorable Mark West, Councilmember, City of Imperial Beach

Diana Limon, Net Zero Plus Institute, Commerce

Mary Cordes-Hutchings, Electrician, San Francisco

Agustin Cabrera, RePower LA & Los Angeles Alliance for a New Economy (LAANE)

Barry Frain, Con J Franke Electric Inc.

Robert Dean, Coalition of California Utility Employees (CUE)

Brian Morales, ProCal Lighting

Floyd Osborne, Mylestone Tech

Brian Downs, Giant Power Communications

Brett Beard, Beard Electric

Matt Furrer, Emcor Group

Larry Strohm, Big Sky Electric

CJ Hamilton, First Responders Electrical Safety Training

The Honorable Nathan Fletcher, Supervisor, District Four, County of San Diego