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Additional submitted attachment is included below.



May 14, 2021

Ms. Patricia Monahan
Commissioners, Energy Commission
1516 Ninth Street
Sacramento, CA 95814
Docket Number: 21-TRAN-01

Re: Joint Coalition Comments on the Implementation of EVITP

Dear Commissioner Monahan,

We, the undersigned organizations, thank you for the opportunity to comment on the Commission's review of the Electric Vehicle Infrastructure Training Program curriculum pursuant to AB 841 (Ting, 2020). We collectively represent large swaths of the charging industry and contractors working expeditiously to deploy stations in support of the state's 2025 deployment goal.

Furthermore, achieving the state's 2035 goal of 1.5 million public chargers is several orders of magnitude higher than the 2025 goal, creating an increased imperative on all stakeholders across the EV ecosystem to work together to speed up the scale of deployment. No agencies know better than the Commission and the Public Utilities Commission all the various on-the-ground hurdles that can slow station deployment.

AB 841 (Ting, 2020) requires contractors to be EVITP certified as a condition of accessing EV charging station incentives from the Commission, the Public Utilities Commission, and the State Air Resources Board. As of April 2020, there are 30,475 eligible general electricians in the State of California. The latest DIR numbers report 1,094 electrical apprentice 2018 graduates. And yet, to date, the EVITP program has certified only 4,000 electricians in the U.S. and Canada.

To keep pace with our state's groundbreaking goals, we must make it easier to deploy stations and easier for eligible electrical workers to access the training necessary to comply with these state requirements. The Commission's oversight of EVITP will be critical to this overall effort. Please consider the following comments to that end:

- 1. The CEC has a statutory obligation to review and approve full EVITP coursework and must have full access to it to ensure completeness.**

AB 841 requires that no later than May 1, 2021, and periodically after that, the Energy Commission, in consultation with the Public Utilities Commission, conduct joint workshops to determine if the EVITP curriculum and testing should be supplemented to include updated or

additional topics necessary to ensure safe installation of charging infrastructure. To fulfill their statutory responsibility, the aforementioned state agencies must have access to copies of the full EVITP curriculum. Additionally, stakeholders such as those who provide other training to electrical workers, EVSE manufacturers, and EVSE owner/operators should be enabled to review the curriculum to determine if it provides accurate and adequate information important for the deployment of this infrastructure.

We have, as a group, brought to the Commission's attention that previous versions of the EVITP curriculum lacked content on important technology now commonly deployed in California – such as adequate content around fast charging or newer, high power technologies like 100kW to 350kW chargers, separate equipment pads, and freestanding switchgear and power cabinets with higher voltage architectures or power sharing capabilities. This is especially critical to the curriculum related to fast charging installations, as AB 841 (Ting, 2020) included special requirements for projects of over 25 kW – in effect any fast charging project – where at least 25% of the total electricians working on a crew for the project must, at any given time, hold Electric Vehicle Infrastructure Training Program certification. Without access to the curriculum, this requirement may be moot, and state agencies are unable to determine if the training program is adequate and has been modified to prepare electricians to install the diverse equipment and technologies being deployed today.

For EVITP to restrict comprehensive review of the curriculum by the state agencies required to evaluate it, and by critical stakeholders, is deeply concerning and threatens EV infrastructure goals. The state agencies should also have access to the Train the Trainer curriculum and be able to certify instructors to be able to teach the curriculum. Without a detailed review of the curriculum from state agencies and critical stakeholders the program at the very least lacks credibility, and at worst could be providing superfluous or inadequate training to participants.

2. EVITP must expand limited exam locations and times to accelerate the certification process.

According to the EVITP website, the exam schedule for the online spring class shows only two locations available for the required in-person examination – one in the Greater Los Angeles area and one in the Bay Area. Having only two exam locations for spring classes in a state as vast as California does not provide adequate access to many contractors who need to be certified.

If EVITP is required for every contractor to install stations that receive incentives from the Commission, the Public Utilities Commission, and the State Air Resources Board, we recommend additional facilities and certified proctors for the required in-person exam certification be added across California to increase the available workforce to install EV charging infrastructure. Suggested locations can include apprenticeship training facilities and electric vehicle manufacturing facilities. Refer to the attached breakdown of the distribution of EVITP contractors and the current lack of approved contractors in broad areas of California.

3. EVITP should remain in an online format indefinitely.

To meet demand, AB 841 currently requires the EVITP to offer courses in an online format that would remain available through December 31, 2024. We recommend the online course offerings be provided quarterly and offered indefinitely. This will improve accessibility and access, especially for those with limited resources and priority communities who can use this as an opportunity to enter the clean energy and transportation workforce.

Thank you for your consideration,

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