

DOCKETED

Docket Number:	24-ALT-01
Project Title:	2024–2025 Investment Plan Update for the Clean Transportation Program
TN #:	257117
Document Title:	Kern County Chapter NECA Comments - 24-ALT-01 and Advisory Committee Meeting
Description:	N/A
Filer:	System
Organization:	Kern County Chapter NECA
Submitter Role:	Public
Submission Date:	6/19/2024 2:08:22 PM
Docketed Date:	6/19/2024

*Comment Received From: Kern County Chapter NECA
Submitted On: 6/19/2024
Docket Number: 24-ALT-01*

24-ALT-01 and Advisory Committee Meeting

Additional submitted attachment is included below.



June 19, 2024

California Energy Commission
Docket Unit, MS-4
Docket No. 24-ALT-01
715 P Street
Sacramento, California 95814

Re: 24-ALT-01 and Advisory Committee Meeting/ CEC ZEV Workforce Training Workshop

On behalf of 100 electrical contractors who employ approximately 2000 electricians throughout Kern County, I am writing to express our concerns with the California Energy Commission's (CEC) proposed EV Charging Infrastructural Workforce Assessment. To ensure safety, this work should be performed by state-certified electricians. Also, the electrical industry already has both the requisite workforce to install and maintain the state's EV charging station targets and the proven training programs to, if needed, prepare additional workforce while creating high-road careers.

The construction, installation and electrical service and maintenance of charging infrastructure require specialized electrical knowledge, safety skills, and experience. Tasks such as power shut off, device isolation, and opening the enclosure of any electrical vehicle supply equipment (EVSE) involve multiple potential hazards. Only state-certified electricians have 8000 hours of electrical construction experience that prepare them to safely perform this work.

It is estimated that California needs to install 1.2 million charging ports by 2030. The state already has the workforce to achieve this. There are currently significantly more than enough state certified general electricians, who also have EVITP certification, to construct, install and maintain this infrastructure.

Lastly, the organized electrical contracting industry has electrical apprenticeship programs that have the facilities, curriculum, equipment, instructors, and expertise to scale the electrical construction workforce as needed immediately. These apprenticeship programs include no or low-cost training, job placement, and mentorship and create high-road careers that pay family-sustaining wages and benefits with advancement opportunities. It is common for these apprenticeship programs to partner with community-based organizations and pre-apprenticeship programs to ensure the inclusion of traditionally underrepresented populations. This apprenticeship training and outreach has been refined over decades. New single-skill training programs are not only often unnecessary but, unlike apprenticeship programs, do not provide similar pathways to the middle class.

We urge the CEC to recognize that electrical work on charging infrastructure be performed by state certified electricians and licensed contractors. This will ensure safety, and the state already has the requisite workforce and training programs to meet its EV charging targets.

Sincerely,

A handwritten signature in blue ink that reads "Cody Brooks".

Cody Brooks
Executive Director
Kern County Chapter NECA