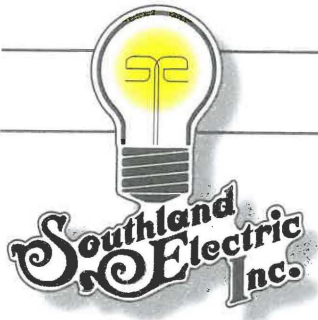


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June 19, 2024

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 350 electrical contractors who employ approximately 8000 electricians throughout Los Angeles and Ventura Counties, 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 requires 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 immediately scale the electrical construction workforce as needed. 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 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,

Leanne Peterson, President