

DOCKETED	
Docket Number:	20-ALT-01
Project Title:	Clean Transportation Workforce and Equity
TN #:	257716
Document Title:	ChargePoint Comments - ChargePoint Comments on CTP Workforce Training Strategy
Description:	N/A
Filer:	System
Organization:	ChargePoint
Submitter Role:	Public
Submission Date:	7/12/2024 8:43:36 AM
Docketed Date:	7/12/2024

*Comment Received From: ChargePoint
Submitted On: 7/12/2024
Docket Number: 20-ALT-01*

ChargePoint Comments on CTP Workforce Training Strategy

Additional submitted attachment is included below.



ChargePoint, Inc.
240 East Hacienda Avenue | Campbell, CA 95008 USA
+1.408.841.4500 or US toll-free +1.877.370.3802

July 12, 2024

California Energy Commission
Docket Unit, MS-4
Docket No. 20-ALT-01
715 Pt Street
Sacramento, CA 95814

Re: Clean Transportation Program (CTP) Workforce Training and Development Strategy

Thank you for the opportunity to submit comments in response to the California Energy Commission's (CEC) workshop on CTP Workforce Training and Development Strategy held on June 25, 2024. We greatly appreciate the CEC's attention to workforce training and believe continued engagement is necessary to prepare the workforce needed to achieve California's transportation electrification goals. We offer the following comments on the CEC's workforce training and development strategy.

1. ChargePoint supports the Incentive Program for Charger Maintenance and Repair Training.
2. ChargePoint urges the CEC to improve training for registered service agents (RSAs) by:
 - a. Integrating information regarding RSA registration requirements into existing training programs.
 - b. Developing new training for RSAs to gain experience with testing equipment.
 - c. Making testing equipment more accessible to the workforce.

About ChargePoint

Since 2007, ChargePoint has been committed to making it easy for businesses and drivers to go electric with one of the largest electric vehicle (EV) charging networks and a comprehensive portfolio of charging solutions. ChargePoint's cloud subscription platform and software defined charging hardware is designed internally and includes options for every charging scenario from home and multifamily to workplace, parking, hospitality, retail, corridor, and fleets of all kinds. ChargePoint's primary business model is to sell our integrated charging software and hardware solutions directly to site hosts and provide services that enable them to provide charging services that align with their specific needs.

ChargePoint has already and will continue to invest in broader training for installers and operations and maintenance partners to work on our equipment. Training is available for all installers, electricians, and developers via [ChargePoint University](#), a free online platform



offering technical documentation, videos, and online learning courses. ChargePoint's installer program empowers our installation partners with the tools and services they need to support the rapid expansion of EV infrastructure and bolster their business for future growth. In addition, a detailed OnBoarding Guide is provided for all new customers, installers, and resellers of ChargePoint equipment. Data sheets, installation instructions, and technical guides are all available on the ChargePoint website and ChargePoint Owner Support is available 24/7 online or via phone for host site owners or partners.

ChargePoint is also developing a new comprehensive training and certification program for anyone who works with EV charging infrastructure, which ChargePoint expects will be the most comprehensive in the EV charging industry, with the aim of reducing reliability issues by ensuring proper installation of charging stations from day one and ensuring effective repairs when required. The new training will first consist of a product-agnostic program that will educate on general EV charging topics like safety, codes, and regulations. The second piece contains training modules on ChargePoint-specific products.

Incentive Program for Charger Maintenance and Repair Training

In the June 25 workshop, CEC staff announced an upcoming incentive program with estimated \$5M budget to support station reliability and funding for charger repair.¹ ChargePoint strongly supports this incentive program, and we look forward to more details on when the program will be opened and made available to charger manufacturers developing training programs and/or individuals seeking to become qualified to service chargers.

As the CEC evaluates its support for this area, it is important to acknowledge that charging stations require a diverse set of maintenance and repair solutions. While electricians provide a critical skillset to safely address any repairs involving live wires such as station replacements, gateway replacements, and CANBUS verification, there is other maintenance work that a qualified person can do without being trained as an electrician—including but not limited to coolant refills, touchscreen replacements, and cable replacements. We request that the CEC clarify that the funding for the Charger Maintenance and Repair Training Incentive Program is intended to apply to qualified individuals receiving training for a variety of maintenance and repair activities, not only for licensed electricians.

Greater training for Registered Service Agents (RSAs)

In 2021, the California Division of Measurement Standards (CalDMS) adopted regulations to oversee the metrological accuracy of commercial EV charging stations. The goal of these weights and measures (W&M) regulations is to ensure that charging stations accurately report the electricity they dispense, which is necessary to ensure a fair marketplace and

¹ Docket 20-ALT-01, Zero-Emission Vehicle Workforce Training and Development Workshop Presentation (June 24, 2024) at slide 45

consumer protection. While CalDMS sets the statewide rules, each county is responsible for enforcement and implementation of the rules.

ChargePoint strongly supports the state’s oversight and regulation of charging station accuracy. However, there are several gaps in workforce training and awareness regarding the implementation of California’s W&M regulations by CalDMS and county sealers. These gaps create friction for charger installs and repair dispatch, including chargers supported by CEC grant funding, and have started to strain the existing workforce of installers and service technicians. If unaddressed, the challenges may threaten California’s ability to meet its infrastructure goals and unduly extend repair times. We urge the CEC to respond with three concrete actions in its workforce development strategy:

1. Incorporate notice of RSA registration requirements into existing training programs.

California state law requires commercial W&M devices, including chargers, to be placed in service by RSAs after installation, repair, or maintenance activity.² Becoming an RSA requires individuals to take an exam that tests their knowledge of the legal and administrative duties to officially place a device into service; importantly, RSA registration does not test any technical knowledge.³ Technical workers qualified to do service work on charging stations are not universally aware of the expectation to register as and fulfill the obligations of RSAs. It would be helpful for installation and service workers to receive, as part of their technical training, notice of the state RSA registration requirements. ChargePoint recommends that the CEC incorporate this information into existing training programs, such as EVITP, during its triennial review of the curriculum, and other developing workforce programs for charging station technicians.

2. New training for hands-on experience with charger accuracy testing devices.

Before a charger is used by drivers for the first time or after a charger receives any maintenance or repair work, RSAs are expected to test it for accuracy and file a “placed-in-service” report with the county. An incomplete or incorrectly filed placed-in-service report may result in the tagging of a charger by the county sealer, which prevents its use by drivers and threatens the station owner with removal of the charger if the situation is not remedied. In ChargePoint’s experience with the implementation of W&M regulations thus far, tagged chargers are more often the result of complex administrative processes and errors with the use of testing equipment, rather than inaccurate chargers. It would be helpful to have a hands-on training program for RSAs to gain experience using the testing equipment to prevent errors that could result in tagged stations. ChargePoint believes this training could be the foundation for a new training program and encourages the CEC to include this concept as part of its workforce development strategy.

² BPC Division 5 Chapter 5.5 §12532

³ <https://www.cdfa.ca.gov/dms/programs/rsa/rsainfoGuide.pdf>



3. Make EVSE testing equipment more accessible to the workforce.

The devices to test charger accuracy are expensive and not widely available, so RSAs have limited access to testing devices. As a result, the need to test devices drives up the cost and time of charger installation and service work. Testing a single Level 2 port for accuracy could take 30 minutes and cost several hundred dollars; this challenge is multiplied for sites with dozens of ports. These are challenges that we intend to resolve with the continued collaboration of CalDMS, county sealers, and the industry. However, we believe there is an opportunity for the CEC to support this work by funding programs to improve the workforce's access to the needed testing equipment, across all regions of the state, especially as the number of Level 2 stations deployed could be limited by the number of testing devices to put them into service.

Conclusion

We applaud the CEC for its efforts to implement and fund workforce training and development programs. These programs will be critical to ensure that California can meet its transportation electrification goals and build a robust workforce of qualified individuals to install, repair, and maintain charging stations. Thank you for the opportunity to submit comments, and please do not hesitate to reach out if ChargePoint can provide more guidance and clarity on the recommendations we have submitted in this letter.

Respectfully Submitted,

Mal Skowron
Manager, Regulatory Policy
ChargePoint, Inc.
Mal.Skowron@ChargePoint.com