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July 12, 2024

Hannon Rasool, Director  
Fuels and Transportation Division  
California Energy Commission  
715 P Street  
Sacramento, CA 95814

**Subject: 20-ALT-01 - Zero-Emission Vehicle Workforce Training and Development Strategy A Roadmap for Clean Transportation Program Funding - Staff Draft**

Dear Mr. Rasool,

Thank you for the opportunity to provide input to the California Energy Commission (CEC) regarding the CEC's Zero-Emission Vehicle Workforce and Training Development Strategy. The CEC's Zero-Emission Vehicle Workforce and Training Development Strategy is a visionary and pragmatic roadmap for building the skilled workforce necessary to support California's transition to a zero-emission transportation system. By addressing workforce needs, expanding certification programs, incentivizing training, and fostering collaboration, this strategy lays a solid foundation for a sustainable and inclusive ZEV ecosystem. We commend the CEC for its leadership and urge the continuation of robust support and investment in workforce development initiatives.

Since 2005, Momentum has helped raise \$5B+ in grants, loans, and other public incentives for projects valued at more than \$11B. We have worked closely with hundreds of clients, partners, consultants, and agency personnel from: public agencies, utilities, technology vendors, manufacturers, and project developers. Our team of scientists, engineers, finance and fund development professionals, commercialization experts, project managers, and administrators are committed to clarity of thought, client education, data-driven analysis, partnership development, and excellence in presentation. We conduct research, analysis, and strategic engagement to increase our clients' ability to access and manage public and private investment.

Momentum's experience in assisting entities in securing and implementing ZEV-funded projects has reinforced our understanding of the essential role that workforce development plays in the success of ZEV initiatives. Developing a diverse workforce is crucial for maximizing the impact of ZEV projects across the state. A diverse workforce ensures that the benefits of the ZEV transition are distributed equitably, enabling all community members to participate in and benefit from the emerging green economy. By focusing on inclusivity, the strategy can address historical disparities and create opportunities for underrepresented groups in the clean transportation sector. We offer the following comments and recommendations on the CEC's eight key objectives to support workforce training and development activities for electric vehicle charging and hydrogen fueling infrastructure.



### **1. Assess Workforce Needs for EV Charging Infrastructure**

Conducting a thorough assessment of workforce needs is essential for identifying gaps and ensuring that training programs are aligned with industry demands. This will help in effectively targeting resources and maximizing the impact of workforce development initiatives. We recommend engaging with industry stakeholders, including employers, educational institutions, and labor organizations, to gather comprehensive data on current and projected workforce needs. We appreciate that the strategy is a living document and encourages updating the assessment to reflect evolving industry trends and technological advancements.

### **2. Increase the Number of EV Infrastructure Training Program (EVITP) Certified Electricians**

Expanding the pool of EVITP-certified electricians, especially in low-income and disadvantaged communities, will enhance the availability of skilled labor required for the installation and maintenance of EV charging infrastructure. We recommend providing financial incentives, such as scholarships and stipends, to encourage participation in EVITP certification programs. We also recommend lowering barriers for under resourced participants to participate in the training program. This could be achieved by providing transportation to training sessions and childcare. The CEC could also partner with community colleges and vocational schools to integrate EVITP training into their curricula.

### **3. Develop an Incentive Program for Charger Maintenance and Repair Training**

Establishing an incentive program for charger maintenance and repair training will ensure that the necessary expertise is available to maintain a reliable and efficient charging network. The incentive program should include on-the-job training opportunities and apprenticeships with pre-identified organizations, which can provide direct experience and facilitate the transition from training to employment.

### **4. Host a Joint Workshop with the CPUC to Discuss EVITP Training and Certification**

Collaboration with the California Public Utilities Commission (CPUC) and Investor-Owned Utilities (IOUs) through joint workshops will foster alignment and coordination between regulatory bodies, utilities, and training providers. The workshop should include a diverse range of stakeholders, including representatives from municipal utilities and Community Choice Aggregators, training organizations, community groups, original equipment manufacturers, project developers, and educational institutions to ensure a holistic discussion on the challenges and opportunities in EVITP training and certification.



## **5. Publish the Draft ZEV Workforce Training and Development Strategy and Incorporate Public Feedback**

Transparency and public engagement are vital for the success of the strategy. Publishing the draft and incorporating feedback will build trust and ensure that the strategy reflects the needs and aspirations of all stakeholders. We encourage utilizing multiple channels, including public hearings, online surveys, and focus groups, to solicit feedback. The CEC should ensure that the feedback process is accessible to all community members, particularly those from underrepresented groups.

## **6. Host a Workforce Training and Development Workshop**

Hosting a dedicated workshop on workforce training and development will provide a platform for sharing best practices, identifying challenges, and fostering collaboration among stakeholders. The workshop should facilitate networking opportunities and breakout sessions to encourage in-depth discussions and partnerships. Outcomes and action items from the workshop should be made publicly available with an opportunity for the public to provide written comments and suggestions.

## **7. Update the Clean Transportation Program Workforce Webpage**

Keeping the Clean Transportation Program Workforce webpage updated with the latest information and resources will enhance awareness and accessibility of workforce development initiatives. We encourage including success stories, case studies, and testimonials from program participants to highlight the impact of workforce development efforts.

## **8. Develop Workforce Requirements for Solicitations Involving Training and Development Activities**

Incorporating workforce requirements into funding solicitations will ensure that training and development activities are prioritized and adequately supported. The CEC should specify clear and measurable workforce development criteria in solicitations, such as the example metrics identified in Lawrence Berkeley National Laboratory's, Equity and Energy Justice-Related Metric Development for Evaluation of State- Level Electric Vehicle Charging Infrastructure Programs Report<sup>1</sup>. Including:

- 1) Number of people hired with addresses in disadvantaged communities (DAC).
- 2) Number of jobs offered in DACs.
- 3) Number of jobs offered in DACs vs. total number of people or jobs offered.
- 4) Number of people trained from DACs.
- 5) Number of training events in DACs.
- 6) Number of certifications or completed trainings for DAC residents.
- 7) Number of trainees that received jobs for DAC residents.

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<sup>1</sup> [https://eta-publications.lbl.gov/sites/default/files/ev\\_equity\\_principles\\_report\\_final.pdf](https://eta-publications.lbl.gov/sites/default/files/ev_equity_principles_report_final.pdf)



- 8) Dollars spent on job training programs for participants from DACs.
- 9) Number of participants from DACs in job training, apprenticeship, and STEM education programs.

These metrics should be included in grant program final reports and knowledge transfer documents to evaluate the implementation of these requirements, ensure compliance and effectiveness, and disseminate best practices so that others may adopt them.

### **Conclusion**

Thanks again for the opportunity to provide comments on the CEC's Zero-Emission Vehicle Workforce and Training Development Strategy. The Strategy represents a bold step toward ensuring all members of the community benefit from the ZEV transition. We appreciate your consideration of our suggestions and look forward to working with the CEC to generate opportunities for economic prosperity and develop an equitable and diverse ZEV infrastructure workforce. If you have any questions, please feel free to contact me at [dedrick@buildmomentum.io](mailto:dedrick@buildmomentum.io).

Sincerely,

*Dedrick Roper*

Dedrick Roper  
Director, ZEV Transition  
Momentum