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IBEW-NECA LMCC of California Public Comment

Additional submitted attachment is included below.



California Energy Commission
1516 Ninth Street
Sacramento, CA 95814

March 19th, 2025

RE: Docket No. 24-EVI-01 – West Coast Truck Charging and Fueling Corridor Project

Dear Honorable California Energy Commission Staff,

On behalf of the California Labor-Management Cooperation Committee (LMCC) of the International Brotherhood of Electrical Workers (IBEW) and the National Electrical Contractors Association (NECA), which represents thousands of highly skilled electricians and hundreds of premier contractors across California, we provide this letter to commend the California Energy Commission (CEC) and Caltrans for their leadership in deploying critical zero-emission vehicle (ZEV) infrastructure under the Charging and Fueling Infrastructure (CFI) Grant Program and emphasize the importance of embedding strong labor and contractor standards into the West Coast Truck Charging and Fueling Corridor Project (Docket No. 24-EVI-01).

To ensure quality, safety, and local high-road careers, California's investment in electrified and hydrogen truck infrastructure must be paired with workforce standards. By requiring skilled electricians and responsible contractors, the CEC can ensure this initiative delivers not just hydrogen fueling and charging infrastructure, but long-term economic benefits and performance reliability exceeding ninety-seven percent (97%) uptime, and automatic compliance with labor standards required for federal EV incentives, including the National Electric Vehicle Infrastructure (NEVI) program and the federal tax credit for EV charging stations in eligible communities.

To fully realize these benefits, we urge the CEC to incorporate the following labor standards into project criteria:

- **Skilled and Trained Workforce Requirements** – Require that all workers performing electrical, hydrogen fueling, and renewable energy infrastructure work meet the **Skilled and Trained Workforce** standard as defined in **Public Contract Code § 2601**.

- **Joint Labor Management Apprenticeship Utilization** – Require at least 20% of total construction labor hours be performed by apprentices indentured in state-approved joint labor-management apprenticeship programs with a graduation rate of at least 60%. This ensures compliance with California’s labor standards and automatic qualification for the federal EV charging station tax credit in eligible communities. Joint Labor Management Apprenticeship programs overwhelmingly provide the quality training, industry alignment, job placement and labor representation that support high-road careers and pathway to the middle class.
- **EVITP Certification for EV Charging Installations** – Ensure that, pursuant to AB 841 and California Public Utilities Commission Code 740.20, and NEVI Standards, crews installing EV infrastructure meet the specified ratios of EVITP-certified electricians. This guarantees workforce readiness to achieve targeted uptime and reliability.
- **Hydrogen Fueling Station Safety Standards** – Require that all electrical work associated with hydrogen fueling stations be performed by a Skilled and Trained Workforce. Given the specialized nature and safety requirements of hydrogen fueling infrastructure, it is essential that only the most highly trained professionals perform this work. This requirement will also support compliance with workforce standards and goals established under the State’s Hydrogen Hub, the Alliance for Renewable Clean Hydrogen Energy Systems (ARCHES).
- **Coverage of Renewable Energy Integration** – Apply these labor standards to all construction, installation, and integration of on-site renewable energy supporting EV charging and hydrogen fueling stations. The reliability of charging and fueling infrastructure depends on properly installed energy storage, solar, and microgrid systems.

By embedding these standards into project evaluation and award criteria, the CEC will not only ensure project integrity and community impact, but also streamline compliance for applicants seeking to leverage federal tax credits. These measures will make sure that California’s investment in zero-emission transportation infrastructure delivers performance reliability, safe and efficient project delivery, and long-term economic benefits for the state. We appreciate the opportunity to provide these recommendations and look forward to working with the Commission to advance California’s leadership in clean transportation and high-road workforce development.

Sincerely,

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Javier Casillas
IBEW Co-Chair
JCasillas@ibew332.org
(408) 269-4332

Signed by:

0A16CC8C4AD54F7...
Greg E Armstrong
NECA Co-Chair
GregA@norcalneca.org
(925) 828-6322