

**DOCKETED**

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**Peninsula Clean Energy Authority Comments on Electric Vehicle Infrastructure Training Program (EVITP)**

*Additional submitted attachment is included below.*



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July 31, 2020

California Energy Commission  
1516 Ninth Street  
Sacramento, CA 95814

**Re: 17-EVI-01- EV Charging Deployment Training and Certification Considerations for CALeVIP**

Dear Commissioners and Commission Staff,

Peninsula Clean Energy Authority (PCE) thanks the California Energy Commission (Commission) for the opportunity to provide these written comments on the Electric Vehicle Infrastructure Training Program (EVITP). PCE also participated in the Commission's July 21, 2020 workshop on this issue, during which numerous stakeholder and commenters expressed their support for including EVITP training opportunities in the California Electric Vehicle Incentive Project (CALeVIP). PCE continues to strongly support this adjustment to the CEC's program.

PCE is a joint powers authority formed to assist San Mateo County in accelerating its decarbonization efforts. To that end, PCE launched the fifth Community Choice Aggregation (CCA) program in California and now serves over 97% of the residents and business in San Mateo County with default energy that is 50% renewable and 95% greenhouse gas (GHG) free – levels well in advance of state mandates. Moreover, PCE is committed to serving all of its customers clean affordable electricity with the goal of its energy supply being 100% GHG free by 2021 and sourced from 100% Renewables Portfolio Standard (RPS)-eligible resources by 2025.

PCE's EV Ready program aims to decarbonize the transportation sector locally through marketing and outreach efforts, customer incentives for electric vehicle (EV) purchases and charging station infrastructure investments (including for low-to-moderate income customers),

and various innovative pilot programs to address difficult-to-reach sectors. PCE is proud to co-fund EV infrastructure deployment with the Commission through the CALeVIP. We are funding \$8 million along with the \$12 million from the CEC to employ a total of \$20 million into the CALeVIP incentives. Our partnership will accelerate deployment of necessary charging equipment in our communities which is a necessary component of spurring EV adoption overall.

PCE's first concern in development of our EV Ready Program is that EVSE equipment is installed in a safe and high-quality manner. Community and worker safety is of highest priority and ensuring public funds are used to support high-quality installations of EVSE equipment will ensure EVSE is available for customers to use when it is needed. To that end, PCE strongly supports EVITP and allowing local partners in CEC programs to require EVITP training as a component of our programs.

EVITP trains electricians to install EV charging infrastructure in a manner that ensures charging stations perform as designed, are reliable and available, and, most importantly, operate safely.<sup>1</sup> EV charging stations, *especially DC fast chargers*, draw significant amounts of power from the grid. Installed improperly, EV charging infrastructure can cause fires, property loss, injuries, and even death.<sup>2</sup> Installed properly by electricians trained by the EVITP, EV charging infrastructure will safely and reliably contribute to the decarbonization of the transportation sector, while reducing risk and liability for charging station owners.

EVITP training does not only contribute to PCE's commitment to safety; it also furthers PCE's goal to support the development of a skilled and trained workforce in San Mateo County. PCE's EV Ready program seeks to bring opportunities to our low-income community members in the green economy by providing both training opportunities and, upon receipt of training, a pipeline to high-quality skilled jobs. Ensuring that trained workers have job opportunities in which

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<sup>1</sup> EVITP Training Program 4.0, Workshop Presentation to California Energy Commission, July 21, 2020, slide 14.

<sup>2</sup> *Id.* at slide 28-29.

they can put their training to use is an essential component of developing and sustaining a skilled workforce. As a collaboration among utilities, vehicle manufacturers, EV service equipment (EVSE) vendors, and the California Community Colleges,<sup>3</sup> EVITP supports this goal by connecting EVITP-certified installers with homeowners and businesses looking to install EV charging stations.<sup>4</sup> To date, the EVITP training center located in San Mateo County has trained over 80 electricians. All training classes are readily available and are either low cost or free of charge.

To support its complementary goals of ensuring safe EV charger installations and supporting a skilled workforce, PCE seeks to require that at least one worker on all EV infrastructure installation crews installing EVSE that is supported by state or local funds be EVITP certified. PCE recommends that the Commission revise its regulations and programmatic policies to allow local funding partners in CALeVIP, such as PCE, to add EVITP training requirements as a condition of receiving funds. Such a requirement would in no way impede progress toward the state's goal of deploying 250,000 chargers by 2025 because there are currently a sufficient number of EVITP-certified installers in California to meet California's EV infrastructure needs.<sup>5</sup> Providing local funding partners with the discretion to require EVITP certification will empower local funding partners to help achieve California's goals while protecting public safety and supporting their local workforces. With PCE's investing millions of dollars in this program, it is important to us that funds are directed toward properly trained installers, who will ensure that installations are safe.

Given the recent delay in the launch of the CALeVIP program, PCE strongly urges the Commission to adjust its program rules and regulations to allow local partners to require EVITP

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<sup>3</sup> <https://evitp.org/partner-advisors/>

<sup>4</sup> <https://evitp.org/find-a-contractor/>

<sup>5</sup> EVITP Training Program 4.0, Workshop Presentation to California Energy Commission, July 21, 2020, slides 38-41.

training at their discretion prior to the launch of the CALeVIP at the end of the year. Safety and quality are just as vital to program success as the speed with which a program rolls out. Given this program is a multi-year program, setting the rules and regulations right at the start will benefit all stakeholders including PCE's workforce training partners.

PCE again thanks the Commission for the opportunity to submit these comments and looks forward to continued engagement with the Commission and stakeholders on this important issue. Please do not hesitate to contact me at [jwiedman@peninsulacleanenergy.com](mailto:jwiedman@peninsulacleanenergy.com) or (650) 260-0083 if you have any questions regarding these comments.

Sincerely,

Joseph Wiedman  
Director of Regulatory and Legislative Affairs