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ChargerHelp! Comments on California's NEVI Deployment Plan

Please see ChargerHelp!'s comments on California's NEVI Deployment Plan.

Respectfully,

Samantha Ortega
Manager, Government Relations

Additional submitted attachment is included below.

ChargerHelp, Inc June 28, 2022

Barby Valentine
Tony Dang
Directors Office of Sustainability
California Department of Transportation
1120 N Street
Sacramento, CA 95814

RE: ChargerHelp! Comments on California's NEVI Deployment Plan Docket 22-EVI-03

Dear Ms. Valentine and Mr. Dang,

ChargerHelp! thanks the California Department of Transportation (Caltrans) and the California Energy Commission (CEC) for its continued commitment to significantly reducing carbon emissions throughout the state. We are pleased to provide comments for California's Deployment Plan for the National Electric Vehicle Infrastructure NEVI Program.

ChargerHelp! is a technology company that enables the on-demand diagnostics, maintenance, and repair of Electric Vehicle Supply/Service Equipment (EVSE)/ EV charging stations. We are a women and minority-owned company that helps solve the industry-wide problem of downed and broken Level 2 and DC fast charging stations. ChargerHelp! oversees 20,000 EV charging stations throughout the US. Through the ongoing partnership with workforce development agencies, EV Network Providers and manufacturers, ChargerHelp! is able to stand up a workforce dedicated to operating and maintaining the different software and hardware technologies existing in the market today.

After reviewing the latest draft of the NEVI Plan for California, ChargerHelp! agrees with the agencies overall implementation vision. The deployment of DC fast chargers is an important next step to equip EV drivers with the capability to travel long distances with confidence. The current EV charging infrastructure has yet to reach the recommended and acceptable 97% uptime. We believe that a consistent plan could ensure that public EV charging stations funded through the Infrastructure Investment and Jobs Act (IIJA) are available and reliable at all times.

Operations and Maintenance Workforce

Therefore, we encourage the CEC and Caltrans to highlight the importance of 1) the skilled workforce for the maintenance and upkeep of the EVSE and 2) short term training programs that are dedicated to supplying a speedy, but rather robust curriculum to properly train the operations and maintenance workforce. We further encourage the agencies to support community based training that will prioritize communities that have historically been affected by air pollution, including persons from disadvantaged and rural communities, and folks needing to reskill who are transitioning from dissolving industries, like oil, gas, nuclear, and traditional automotive mechanics into the cleantech industry.

Workforce development is a cornerstone at ChargerHelp!. With the creation of an emerging occupational classification approved by the US Department of Labor, EVSE Technicians, whether employed in-house by the EVSE Network Providers or manufacturers, or employed through third-party tech companies, like ChargerHelp!, will continue to play a significant role in the ongoing reliability for EV drivers. ChargerHelp! also partners with widely known charging station manufacturers and network providers, who have taken measurable steps in providing training services/certificates, boarding new certified technicians in the repair of their proprietary charging stations equipment.

EVSE Technicians receive OSHA and NFPA training to be authorized to recognize fire and electrical hazards, courses that could be fulfilled in less than one (1) week. Technicians are also trained in the software and hardware of Level 2 and DC fast chargers; maintenance training could average four (4) weeks. This occupational class is low risk. We understand that the NEVI guidance is recommending two pathways for operations and maintenance workforce but training programs excessively over this time period will exacerbate already existing inequities and workforce recruitment/training barriers.

Additionally,

Ongoing Maintenance Plans

ChargerHelp! supports the agencies plan to implement the same operations and maintenance plans as were included in the CEC's REACH and REV Charging funding programs. Service level agreements are pertinent to bridging the gap between network providers, manufacturers, and site hosts. Utilizing these consistent plan allows for all parties involved to pre-budget and pre-plan maintenance costs for failures that exist with evolving technologies and natural accidents. In order to ensure the state meets the federal requirement of 97% uptime, we recommend the state utilize the same response time within 48 hours from the time malfunctions or required repairs are reported; and a response time of 2-5 days for significant and more complex issues.

In our latest research, we have found that on average, 30% of public EV charging stations are offline and/or broken at any given time. Networked DC fast chargers, as Level 2 chargers, are Internet of Things (IoT) electronics and are prone to failures. The IoT electronics are equipped with a wide range of technologies that incorporate payment systems, internet, cell service, and EVSP remote operations. Similarly, hardware and parts malfunction is of priority. In order to bridge the current gap in the industry, we agree that applicants and site hosts must have a proactive preventative maintenance plan in order to avoid inoperable and stranded assets, stations must be reliable for EV drivers at all times.

We appreciate the opportunity to provide comments.

Respectfully,

Samantha Ortega
Manager, Government Relations