

**DOCKETED**

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*Comment Received From: Cory Bullis*  
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**Joint EV Stakeholders Comment Letter on EVITP**

*Additional submitted attachment is included below.*



July 31, 2020

Ms. Patricia Monahan  
Commissioner, Energy Commission  
1516 Ninth Street, MS-33  
Sacramento, CA 95814

**Re: Important Considerations Before Requiring EVITP Certification**

Dear Commissioner Monahan,

We, the undersigned entities (“Joint EV Stakeholders”), appreciate the California Energy Commission’s (CEC) attention to issues of safety for the installation of electric vehicle (EV) charging stations. As leaders in the EV and AV space in California, the Joint EV Stakeholders support the safe installation of EV charging infrastructure and additional training opportunities to build the workforce necessary to spur the transition to EVs. However, based on our collective experience in the EV industry, the Joint EV Stakeholders see attempts to mandate Electric Vehicle Infrastructure Training Program (EVITP) certification as a condition of accessing CALeVIP incentives as premature. As such, we offer the following questions and comments for consideration:

- 1. It is unclear what benefits the EVITP would provide above and beyond what is already required by licensed contractors.**

During the workshop, an EVITP representative stated that this certification teaches electricians how to conduct site assessments and perform load calculations. This knowledge is not unique to EV charging installations and is taught in most electrician training courses. In addition, it is part of the rigorous testing requirement for obtaining a C-10 electrical contractor’s license. A C-10 license holder does not need to be a journeyman electrician, but a C-10 license holder is required to have at least one journeyman electrician on every job site. The license holder is responsible for the safety of all personnel and property. The Joint EV Stakeholders question the additional benefits that EVITP certification provides above and beyond a C-10 license. We strongly recommend that the CEC first determine and identify what additional safety benefits there are,

if any, from EVITP certification before mandating it, and further vet EVITP - or alternative training and safety programs - through a more robust stakeholder process.

Further, the framing and tone of the EVITP conversation and curriculum during the workshop was alarmist in a way that may hinder rather than help the electrification movement. The majority of the examples presented by EVITP at the June 21 workshop include fires associated with EV chargers **outside** of California years ago. There is no clear evidence in the California examples provided that lack of training was a substantial factor in the causation<sup>1</sup>, nor did they clearly explain why EVITP certification was the only way to prevent these fires. The State Fire Marshal's office reported that, over the past 10 years, there have been at most 124 fire incidents where EV chargers were present, noting this to be extremely low. There is no data to indicate whether these fires were caused by poor electrical work or whether EVITP certification would have made a difference in the outcome. Ultimately, it is not clear that the C-10 safety training overseen by the state does not provide adequate safety training.

**2. The EVITP curriculum has not yet been vetted by California stakeholders, and a more robust stakeholder process will be necessary to ensure that the curriculum benefits the workforce it is intended to serve.**

EV charging technology continues to rapidly evolve. Therefore, the EVITP curriculum should reflect the latest technology trends. However, upon initial review, EVITP's curriculum is not up to date with the latest technology trends, such as power sharing technology for high-powered DCFCs. These high-powered technologies are also extremely relevant to the emerging area of heavy-duty vehicles, including public transit. Furthermore, while EVITP was last updated through a stakeholder process in 2019, the advisory committee mostly included utilities and automakers with little representation from experienced players in the EV charging industry. When asked during the workshop, stakeholders learned that the curriculum would only be updated every 18-24 months, meaning that if EVITP is mandated before then without a more extensive California and industry-focused group, the curriculum will be out of date, not reflect current technology trends, and may therefore fall short in providing the most beneficial training for the workforce it is intended to serve.

We strongly recommend the CEC lead a more inclusive stakeholder process to vet EVITP's curriculum further to ensure it reflects the latest technology trends and related safety best practices. Given that the California Public Utilities Commission is considering similar questions through the DRIVE OIR, a joint agency stakeholder process may be most appropriate. Should the CEC determine it is prudent to mandate this certification, it should continue to provide oversight to EVITP to ensure it regularly updates curriculum through a wider stakeholder process, and that ample opportunities exist for training.

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<sup>1</sup> "A substantial factor in causing harm is a factor that a reasonable person would consider to have contributed to the harm. It must be more than a remote or trivial factor. It does not have to be the only cause of the harm." California Civil Jury Instructions (CACI) 430.

### **3. EVITP needs more training infrastructure in place to train an influx of electricians before being required.**

According to the International Brotherhood of Electrical Workers (“IBEW”), there are more than 30,000 state-certified general electricians in California and most have the necessary skills to construct and maintain EV infrastructure. However, only about 1,400 of those California electricians are certified through EVITP<sup>2</sup> and there are only 40 certified trainers in the program<sup>3</sup>. Further, these 20-hour courses are done in person, and under shelter-in-place, they have been postponed<sup>4</sup>, which further exacerbates the shortage. Additionally, most of the EVITP certified installers are located in coastal, urban areas<sup>5</sup>, which adds additional challenges to installing chargers in rural, inland areas, where there is more need to expand infrastructure.

The Joint EV Stakeholders are concerned that there is not enough training infrastructure to handle an influx of what will likely be thousands of electricians looking to get certified if a mandate on certification is put in place. During the workshop, it was repeatedly stated that EVITP is a small, volunteer, nonprofit organization that offers training “on demand”. It was unclear from the workshop whether sufficient opportunities will exist for online learning in light of the pandemic. If there is not enough training infrastructure in place, this could unintentionally slow charging station deployment by locking out viable EV charging projects if contractors don’t have this certification. The CEC and Center for Sustainable Energy provided few details during the workshop as to how and when EVITP would be incorporated into CALeVIP, which left stakeholders with more questions than answers as to a smooth implementation pathway.

As the charging industry grapples with recession, the state needs to help people get back to work faster and help rejuvenate this sector, whereas this requirement could have the opposite effect. After further stakeholder discussions on the merits of additional training and safety requirements of EVITP or another equivalent training, we strongly recommend that the CEC holds a more robust conversation on implementation details to ensure there is enough easily accessible and widely available training infrastructure in place to handle an exponential increase in applicants before mandating this or any other certification.

### **4. If additional safety training is deemed necessary, it should be vendor neutral and administered by the state or other entities.**

Given the EVITP is the only entity offering these trainings, mandating it will not only restrict the deployment of EV infrastructure, but it will also raise costs to all EV drivers. While the training

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<sup>2</sup> Stated in a letter on the Advanced Truck Rule submitted to the California Air Resources Board in March of this year by the International Brotherhood of Electrical Workers and the National Electrical Contractors Association available at: [https://earthjustice.org/sites/default/files/files/2020-03-16\\_act-coalition-electric-truck-charging-infrastructure-letter.pdf](https://earthjustice.org/sites/default/files/files/2020-03-16_act-coalition-electric-truck-charging-infrastructure-letter.pdf)

<sup>3</sup> Stated by EVITP in a CEC webinar July 21, 2020, CEC Efiling Docket Number 17- EVI-01 available at: <https://efiling.energy.ca.gov/Lists/DocketLog.aspx?docketnumber=17-EVI-01>.

<sup>4</sup> See: <https://efiling.energy.ca.gov/GetDocument.aspx?tn=233823&DocumentContentId=66496>

<sup>5</sup> See: <https://evitp.org/california>

is only \$75 today, there are no limits imposed on how much EVITP can charge for the training or what criteria need to be met in the curriculum. We urge that if additional training is deemed necessary, the CEC should consider whether it would be more appropriate for the training to be administered by the state, in conjunction with C-10 licensing requirements. Alternatively, the CEC could look to NABCEP training as a precedent whereby multiple entities are permitted to issue the certification. Either way, the Joint EV Stakeholders assert that no single organization should have a monopoly on providing training, especially if that training is to be mandatory as a contingency of funds for a statewide program.

We look forward to working collaboratively with the CEC and other stakeholders to ensure that EV charging deployments continue to be deployed with regard to the highest standards of integrity and safety, and to ensure that a robust clean transportation workforce is in place to help California transition to a clean transportation future.

Sincerely,

Abdellah Cherkaoui  
Electric Vehicle Charging Association

Francesca Wahl  
Tesla

Matthew Nelson  
Electrify America