

Communication from Public

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Comments for Public Posting: Please find comment letter originally submitted on 10/20/22 from a coalition of EVSE companies on the Item: ChargePoint, ChargerHelp, Electrify America, Enel and Tesla.

October 20, 2022

Councilmember Mitchell O'Farrell
Los Angeles City Council
200 N. Spring St.
Los Angeles, CA 90012

Re: Los Angeles City Council Energy, Climate Change, Environmental Justice and River Committee Agenda Item No. 7 (21-0890-S1) – City of Los Angeles (City) Interest to Adopt Electric Vehicle Infrastructure Training Program (EVITP)

Dear Chairman O'Farrell:

We as representatives of a coalition of Electric Vehicle Supply Equipment (EVSE) industry support the City of Los Angeles' Electric Vehicle Master Plan's goals and would like to offer the following comments on the agenda item No. 7 and Chief Administrative Officer (CAO) report.

Los Angeles requires significant EV infrastructure to support EVs. According to the October 13, 2022, report from the Office of the City Administrative Officer of Los Angeles, "... the Department of Water and Power projects that the LA region will have a projected infrastructure gap of approximately 97,000 level 2 chargers and 2,500 level 3 chargers by 2030."¹ To overcome this gap, we recommend *that the City keep workforce requirements as flexible as possible to mitigate workforce shortages and remove barriers to enter the clean energy industry.*

Workforce availability is a key barrier to EV infrastructure build-out. It is no secret that EVSE industry as well as other industries are experiencing a reduction in the number of available electricians. Reasons for the shortage include electricians retiring at a faster pace than the numbers of new entrants into the workforce.² According to the U.S. Bureau of Labor Statistics (BLS) and the National Electrical Association, "7,000 electricians join the field each year, but 10,000 retire."³ We expect an increase in the demand for electricians due to the Federal Government's investments through National Electric Vehicle Infrastructure (NEVI) program and the state of California's investments plan to deploy billions of dollars for EVSE.

EVSE training and certification should not be restricted only to EVITP. Los Angeles should allow individuals certified by third parties to install city-owned EVSE. To meet both the EVSE demand and overcome the labor shortages, we recommend that the City allow for EVSE installation to be performed by individuals who received training and certification through other programs in addition to EVITP. The EVSE labor workforce is nascent and new curriculum and training programs are being developed as technology evolves. The City should allow for

¹ Office of City of Administrative Office Report, October 13, 2022 re: EVITP Requirement

² <https://solutions.borderstates.com/the-electrician-shortage/>

³ <https://www.payscale.com/career-advice/shortage-of-electricians-leads-to-shockingly-high-salary-potential-and-opportunities/>

opportunities to leverage existing programs that are training the workforce in adjacent energy industries and look at creative solutions such as on the job training to meet requirements.

EVITP certification requirements should be limited to electrical installation work on City-owned EV charging stations. Not all parts of EVSE installation require an electrician to be present. There are numerous other non-electrical activities involved such as trenching, fencing, or pouring concrete. Requiring electricians to be on-site for non-electrical installation work is unreasonable.

In sum, we welcome the opportunity to continue to work with City to deliver its EV master plan.

Sincerely,

