



March 7, 2023

Senator Janeen Sollman, Chair
Senate Committee on Energy and Environment
Oregon State Legislature
900 Court St. NE
Salem, OR 97301

Re: Opposition to SB 582, Unless Amended

Dear Senator Sollman,

The group of undersigned EV Stakeholders appreciate the goal of SB 582 to ensure safe installations of electric vehicle charging infrastructure. As leaders in the EV industry, we 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, we believe mandating that the Electric Vehicle Infrastructure Training Program (EVITP) be the sole certification program, as proposed in SB 582, will create an unnecessary barrier to safe and efficient installation of EV charging infrastructure, thereby slowing the adoption of EV vehicles.

We respectfully request consideration of the following issues and amendments, which we discussed and shared with Senator Leiber's Office a few weeks ago :

1. Allow other organizations and programs, in addition to the Electric Vehicle Infrastructure Program, to offer certification training. Establishing a monopoly certification program will reduce the transparency, and curriculum is less likely to be kept current with the rapidly changing technology and regulations. Furthermore, allowing other organizations to offer the equivalent certification training will ensure greater numbers of certified electricians in the near term and will align with the federal guidelines for the National Electric Vehicle Infrastructure Program (NEVI).
2. Extend the exemption for certified electricians to include residential townhouses, and duplexes, and also for multi-family dwellings where 25 or fewer chargers are installed. Licensed electricians are qualified to do these types of installations without additional certification.
3. EV charging demand is great and EV charging technology continues to rapidly evolve. Thus, we recommend that the Electrical and Elevator Board, in

coordination with the Department of Transportation and Department of Energy, be required to review and facilitate at least one workshop reviewing the EVITP and equivalent certification programs, to ensure that the programs provide:

- a. Additional safety and technical training to electricians beyond standard electrician training.
 - b. Accurate and current information and, at minimum, annual alignment with technology changes and state codes and standards; and
 - c. Frequent training and testing offerings, with online training and testing options.
4. There is a need for Legislative oversight of this training certification program to ensure it does not become a barrier to safe and efficient installation of the EV charging infrastructure to support the rapidly expanding use of electric vehicles. The Electrical and Elevator Board, in coordination with the Departments should be required to report annually to the legislature a summary of certification programs used in compliance with this act, including, but not limited to:
- a. Detailed description of course material;
 - b. Outline of course implemented and planned updates;
 - c. Evaluation of the added value of the program beyond standard electrician training;
 - d. Analysis on the workforce impact and availability of the program, by area and demographic.

We look forward to the opportunity to work with the author's office to address the issues we have raised.

Sincerely,
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Electric Vehicle Charging Association

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