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Filer:	Cristina Marquez
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IBEW 569

June 17, 2024

California Energy Commission
Docket Unit, MS-4
Docket No. 24-ALT-01
715 P Street
Sacramento, California 95814

Re: 24-ALT-01 and Advisory Committee Meeting / CEC ZEV Workforce Training Workshop

On behalf of IBEW 569 and our 3,700 union electricians and power professionals in San Diego and Imperial Counties, I am writing to express our concerns regarding the proposed Workforce Training and Development Strategy by the California Energy Commission. Specifically, we would like to address the need for clarity in the discussion of charger maintenance and repair or O&M (Operations and Maintenance) work.

The training received for our Electricians gives them the knowledge and skills to maintain and repair chargers and much more. The organized electrical contracting industry apprenticeship programs have been a blueprint for building high-road pathways to successful rewarding careers for more than 100 years and our apprenticeship is the third largest in the state of California. Through pre-apprenticeship initiatives, we empower underserved community members to join pre-apprenticeship programs that provide disadvantaged community members with the ability to enter an apprenticeship program. This is a model that works, provides high-road jobs, living wages, and excellent benefits.

There are many reasons why EV charging stations may become non-operational, and maintaining and repairing these stations can pose significant electrical risks. It is essential to establish clear guidelines for categorizing major types of EVSE maintenance and operation consistently. Any maintenance or repair work on EVSE that involves line voltage must be conducted by electricians. We possess the expertise and skills required to manage electrical hazards safely.

We urge the CEC to ensure that clear guidelines are established to protect all EVSE O&M workers from electrical hazards by designating electricians as the qualified professionals for this type of work.

Respectfully,

Jeremy Abrams
Business Manager