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*Comment Received From: IBEW Local 40
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**24-ALT-01 and Advisory Committee Meeting CEC ZEV Workforce
Training Workshop**

Additional submitted attachment is included below.



**International Brotherhood of Electrical Workers
Local Union 40**

Affiliated with AFL-CIO

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Stephan Davis
Business Manager/
Financial Secretary

July 8, 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 Local 40 and our 1,000 union electricians and power professionals, 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.

There is a wide range of potential causes for EV charging stations to be out of service, and the maintenance and repair of these stations can involve significant electrical hazards. It is crucial that a clear parameter is consistently applied to the major category of EVSE O&M work. Any maintenance and repair of EVSE that involves line voltage should be performed by electricians, who have the necessary knowledge and experience to handle 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.

Sincerely,

Stephan Davis
Business Manager | Financial Secretary