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Additional submitted attachment is included below.

July 10th, 2024

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

Re: 20-ALT-01 and CTP Workforce / CEC ZEV Workforce Training Workshop

On behalf of IBEW 180 and our 650 union electricians and power professionals, I am writing to highlight the importance of recognizing the electrical hazards associated with charging stations or EVSE O&M work. This work requires specialized electrical knowledge, safety skills, and experience that only electricians possess.

Tasks such as power shut off, device isolation, and opening the enclosure of any EVSE involve potential hazards, including arc flash, electrical shock, and burn injuries. These hazards require proper training and personal protective equipment, which only electricians are equipped to handle. An untrained individual would be unaware of these hazards and could be exposed to serious injury.

There are also at least 30,000 electrical shock incidents per year. Approximately 5% of all burn unit admissions in the United States occur because of electrical injuries.

We strongly recommend that the CEC acknowledges the critical role of electricians in performing EVSE O&M work and ensures that only qualified electricians are engaged in these tasks to maintain the highest level of safety for workers and the public.

Additionally, it should be recognized that the organized electrical contracting industry apprenticeship programs have been a model for building high-road pathways to successful, rewarding careers for more than 100 years. Our organized electrical contracting industry utilizes 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.

With Respect,



Herb Watts,
IBEW 180 Business Manager