

<b>DOCKETED</b>	
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<b>Project Title:</b>	Clean Transportation Workforce and Equity
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*Comment Received From: IBEW LOCAL 428  
Submitted On: 7/10/2024  
Docket Number: 20-ALT-01*

**20-ALT-01**

*Additional submitted attachment is included below.*



July 10, 2024

California Energy Commission  
Docket Unit, MS-4  
Docket No. 20-ALT-01  
715 P Street  
Sacramento, California 95814

Re: 20-ALT-01 and Clean Transportation Workforce and Equity

On behalf of IBEW 428 and our nearly 1,300 Union electricians and their families, 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,

A handwritten signature in blue ink, appearing to read "Brian Holt".

Brian Holt  
Business Manager/ Financial Secretary

