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20-ATL-01 and "CTP Workforce

Additional submitted attachment is included below.

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July 10, 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 Local 1245 and our 21,000 union electricians and power professionals, I am writing to highlight the importance of recognizing the electrical hazards associated with charging station or EVSE operation and maintenance work. This work requires specialized electrical knowledge, safety skills, and experience that only qualified electricians and line workers 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 utility 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 utility electrical contracting industry utilizes preapprenticeship programs that provide disadvantaged community members the ability to enter an apprenticeship program. This is a model that works, provides high-road jobs, living wages, and excellent benefits. The State of California also recognizes these pathways. The California Workforce Development Board has worked with Local 1245 to support two high road training programs for 1245 and other IBEW workers.

Sincerely,

Bob Dean, Business Manager

IBEW Local 1245