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January 8, 2024

VIA Email and Docket #2023-UPs

Kristin Ralff Douglas
Program Manager, Electrical Undergrounding Division
Office of Energy Infrastructure Safety
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ElectricalUndergroundingPlans@energysafety.ca.gov

RE: **Comments of the Coalition of California Utility Employees on the Development of Guidelines for the 10-Year Undergrounding Distribution Plan**

Dear Ms. Douglas:

We write on behalf of the Coalition of California Utility Employees (CUE) to provide comments on the working group meetings held by the Office of Energy Infrastructure Safety (Energy Safety) to develop guidelines for the 10-year undergrounding distribution infrastructure plan (Undergrounding Plan). CUE's comments focus on elements of the utility and contractor workforce development plan (WDP) which must be included in the Undergrounding Plan pursuant to Public Utilities Code § 8388.5(c).

CUE is a coalition of labor unions whose approximately 43,000 members work at nearly all the California electric utilities, both publicly and privately owned. CUE's coalition union members make up the on-the-ground workforces of the IOUs that would implement the Undergrounding Plan. CUE has participated in proceedings before the California Public Utilities Commission for more than 25 years, including as a party to general rate cases, the Order Instituting Rulemaking to Implement Electric Utility Wildfire Mitigation Plans Pursuant to Senate Bill 901 (2018), and other related proceedings.

SB 884 requires that an Undergrounding Plan include “[a] plan for utility and contractor workforce development.”¹ During the working group meeting on November 21, 2023, Energy Safety presented five questions to aid in the development of guidelines for the WDP.² CUE’s response to each question is presented below.

1. What are the elements that should be included in utility and contractor workforce development plan for a 10-year Undergrounding Plan?

In general, the WDP must (1) identify the IOU’s workforce needs for the entire duration of the 10-year Undergrounding Plan, (2) describe how the IOU intends to meet those workforce needs on a yearly basis, and (3) identify any potential constraints that would limit the IOU’s ability to meet its workforce needs. For the first element, IOUs should identify the categories of workers that are needed to execute undergrounding projects and, for each year of the plan, estimate the total number of workers for each classification. For the second element, IOUs should explain what training and recruitment activities it will undertake to meet the yearly headcount targets for each worker classification and identify the mix of employees and contractors that it will rely on to meet the headcount targets. For the third element, IOUs should list any foreseeable limitations that may hinder its ability to grow an adequately sized workforce to fully execute the Undergrounding Plan.

Finally, the WDP should describe any potential impacts that implementation of the Undergrounding Plan could have on other programs which rely on the same personnel. Much of the on-the-ground workforce responsible for executing undergrounding projects is also responsible for executing traditional infrastructure projects and programs that are necessary to maintain a safe and reliable system. It is critical that implementation of the Undergrounding Plan does not come at the expense of other critical safety and reliability-related projects and programs.

2. What is the timeframe that the workforce development plan should cover?

Long-term planning is essential because it takes significant lead time to develop trained and qualified personnel who can implement undergrounding

¹ Pub. Util. Code § 8388.5(c)(5).

² Memo to Stakeholders from Kristin Ralf Douglas re: Working Group #3 Topics (Nov. 15, 2023).

projects. For example, it takes approximately 4 to 5 years to complete the education and training necessary to become a journeymen lineman. Moreover, there is currently a national shortage of electric linemen. Therefore, the WDP should cover the entire 10-year period to ensure that the IOU has an adequately sized workforce to execute the Undergrounding Plan.

3. Should the workforce development plan cover recruitment as well as training?

Yes, the WDP should cover recruitment and training. IOUs should describe the qualifications necessary for each of the workforce classifications that would be needed to execute the Undergrounding Plan. IOUs should also describe any constraints that may limit its ability to grow its workforce internally or attract qualified workers.

4. Should the workforce development plan provide a plan to scale up the workforce broken down by type of personnel?

Yes, the workforce development plan should identify how the IOU plans to scale up the workforce to execute the Undergrounding Plan. IOUs should explain how its plans to scale up the workforce to execute the proposed undergrounding projects would not come at the expense of other safety and reliability-related programs that rely on the same personnel.

5. Should the workforce development plan include community and labor organization outreach related specifically to workforce development?

Yes, the WDP should include community and labor organization outreach related specifically to workforce development. CUE's member organizations have a long history of collaborating with IOUs on workforce development and expects that to continue through implementation of any proposed Undergrounding Plan.

We urge Energy Safety to incorporate these recommendations for the utility and contractor workforce development plan into the guidelines for the Undergrounding Plan to ensure that IOUs have an adequately sized and trained workforce to execute the proposed undergrounding projects safely, efficiently, and cost-effectively.

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Thank you for your consideration of these comments.

Sincerely,



Andrew J. Graf

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