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May 29, 2024

## **VIA Email and Docket #2023-UPs**

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RE: **Comments of the Coalition of California Utility Employees on the Draft 10-Year Electrical Undergrounding Plan Guidelines**

Dear Ms. Douglas:

We write on behalf of the Coalition of California Utility Employees (CUE) to provide comments on the Draft 10-Year Electrical Undergrounding Plan Guidelines (Draft EUP Guidelines).<sup>1</sup> CUE's comments focus on the workforce development plan (WDP) which must be included in the EUP. In sum, the Draft EUP Guidelines fail to ensure that the EUPs contain a clear, transparent WDP. Without explicit criteria on WDP elements – such as measurable objectives, timelines, budget allocations, and metrics of success – the Draft EUP Guidelines can lead to inconsistent and inadequate submissions that fail to address critical aspects of workforce development. Consequently, the guidelines must be revised to ensure that IOUs provide sufficient assurances that the WDP will effectively contribute to growing and maintaining a robust and skilled workforce.

SB 884 requires that EUPs include “[a] plan for utility and contractor workforce development.”<sup>2</sup> In an attempt to satisfy this component, the Draft EUP Guidelines require that the EUP “contain a description of how the large electrical corporation will successfully secure the resources required to implement the EUP

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<sup>1</sup> Office of Energy Infrastructure Safety, Draft 10-Year Electrical Undergrounding Plan Guidelines (May 8, 2024).

<sup>2</sup> Pub. Util. Code § 8388.5(c)(5).

for the full 10 years.”<sup>3</sup> The proposed language fails to provide clear directives that ensure IOUs produce a transparent and effective plan for developing and maintaining an adequately sized workforce to execute the EUP.

For example, the guidelines do not mandate specific benchmarks or timelines for workforce expansion and training, leaving utilities without a standardized framework to follow. Furthermore, the guidelines lack detailed requirements for reporting on WDP progress and accountability measures, which are essential for tracking the success of the workforce development initiatives. This vagueness permits IOUs to submit plans that will not be comprehensive or aligned with the long-term needs of the undergrounding projects, thereby undermining the objective of securing a skilled and trained workforce over the decade-long period.

As CUE previously explained, long-term workforce planning is essential because it takes significant lead time to develop trained and qualified personnel who can implement undergrounding projects. For example, it takes approximately 4 to 5 years to complete the education and training necessary to become a journeyman lineman. Moreover, there is a national shortage of electric utility lineman due to the aging workforce, increased demand, training and entry barriers, and frequency of natural disasters.

Energy Safety should require IOUs to identify the specific job classifications for field employees that work on undergrounding projects and quantify the number of EUP field employees that are needed on an annual basis. Having a workforce target promotes accountability and progress tracking, enabling the IOUs and regulators to monitor and adjust strategies as needed to stay on course. This structured approach ensures that the workforce is adequately prepared and available to undertake the extensive and technically demanding tasks involved in a long-term undergrounding plan.

A headcount target is already used by Southern California Edison (SCE) as part of its Safety and Reliability Investment Incentive Mechanism (SRIIM). SRIIM requires SCE to spend funds on safety and reliability as authorized by the California Public Utilities Commission (Commission) or make refunds to ratepayers.<sup>4</sup> As part of the workforce component, SCE identifies specific job classifications of field employees that work on safety and reliability-related

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<sup>3</sup> Draft EUP Guidelines at p. 13.

<sup>4</sup> D.21-08-036 at p. 57.

programs.<sup>5</sup> The Commission sets a headcount target for SRIIM classifications which SCE must meet or exceed by the end of the GRC cycle based on the forecasted number of employees SCE needs to complete all safety- and reliability-related work over the course of the GRC.<sup>6</sup> In recent GRCs, the headcount target was based primarily on the expected average yearly growth for each SRIIM employee classification net of attrition.<sup>7</sup> If the headcount target is not met by the end of the GRC, SCE must return funds to ratepayers for each employee shortfall relative to the target.<sup>8</sup> As a result, the target incentivizes SCE to hire and maintain an adequate workforce of field employees that work on safety and reliability-related projects and programs.<sup>9</sup>

To be clear, CUE does not recommend that Energy Safety adopt a penalty component, only an annual EUP headcount target. The purpose of the EUP headcount target is to ensure that the IOUs identify clear and measurable staffing goals. The target acts as a benchmark for the IOUs, guiding their recruitment, training, and retention efforts to ensure they have a sufficient and skilled workforce to meet the EUP's demands. With a defined target, IOUs can proactively address potential labor shortages, invest in training programs, and build a pipeline of qualified workers.

Finally, because much of the on-the-ground workforce responsible for executing underground projects is also responsible for executing traditional infrastructure projects and programs that are necessary to maintain a safe and reliable system, the Draft EUP Guidelines should require that IOUs describe any potential impacts that implementing the EUP could have on other programs which rely on the same personnel to ensure a comprehensive understanding of resource allocation and project prioritization. Undergrounding projects are labor-intensive and could significantly draw from the pool of available field personnel, potentially diverting attention and resources from critical maintenance and safety initiatives. By mandating a detailed assessment of the potential impacts, IOUs can better plan and balance their workforce to avoid compromising the safety and reliability of existing infrastructure. This requirement ensures transparency in how IOUs intend to manage simultaneous demands on their workforce, facilitating informed

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<sup>5</sup> *Id.* at p. 58.

<sup>6</sup> *Id.* at p. 58-59.

<sup>7</sup> *Ibid.*

<sup>8</sup> D.15-11-021 at p. 37.

<sup>9</sup> *Ibid.*

decision-making and regulatory oversight to maintain a high standard of service across all operations.

CUE recommends the following revisions to Section 2.5.2:

Section 8388.5(c)(5) requires the EUP to include a “plan for utility and contractor workforce development.” To fulfill this component, the EUP must contain a description of how the large electrical corporation will successfully secure the **workforce** resources required to implement the EUP for the full 10 years~~s~~, **including a narrative for each of the following:**

- a. **A list of the job classifications for the field employees needed to execute the EUP.**
- b. **Annual EUP workforce targets (i.e., the number of forecasted EUP field employees net of attrition needed each year to execute the EUP), including a description of how the large electrical corporation derived its targets.**
- c. **A description of the mix of employees and contractors the EUP intends to rely on to meet the annual EUP workforce targets.**
- d. **A description of the training, recruitment, and retention activities the large electrical corporation will undertake to meet the annual EUP workforce targets.**
- e. **A description of potential constraints that would limit the ability of the large electrical corporation to meet its workforce needs, and its strategy for addressing those constraints.**
- f. **A description of potential impacts that EUP implementation may have on traditional safety- and reliability-related projects and programs that rely on the same field personnel.**

We urge Energy Safety to incorporate these recommendations into the Draft EUP Guidelines 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

AJG:acp