

July 26, 2018

Re: Informal Comments of the California Energy Storage Alliance (CESA) on the Draft Safety Requirements Checklist for Approved Transportation Electrification Programs Distributed by the Utilities on July 19, 2018

The California Energy Storage Alliance (CESA) supports the assurance of safety during the pre-construction, construction, and operational stages of the transportation electrification programs. While CESA continues to review the technical merits of several of the proposed safety requirements in the draft checklist, CESA's main concern with the current draft involves the requirement during construction that:

“2. All utility infrastructure work on the customer side of the meter not performed by employees of the IOUs shall be performed by contractors that are a signatory to the IBEW who hold a valid C-10 contractor's license.”

CESA disagrees with setting the requirement in the safety checklist that contractors who hold a valid C-10 contractor's license should also be a signatory to IBEW without first providing further analysis as to the added safety benefits of this requirement. It is unclear from the record in A.17-01-020 and other transportation electrification efforts at the Commission if there is any added safety value from including the IBEW signatory requirement as an addition to the C-10 contractor's license standard. Requiring contractors to hold a valid C-10 contractor's license should be sufficient from a safety perspective to ensure programs meet applicable safety standards.

CESA recommends further evaluating the added safety value of the IBEW signatory requirement in the context of the current infrastructure programs that are separate from the SB 350 transportation electrification programs prior to mandating this requirement in the context of all transportation electrification programs going forward. Specifically, the Commission should consider the difference in application for the residential sector where customers may be working with a local contractor themselves without going through the utility to pick. This requirement may limit customer choice without any potential additional safety benefit. Therefore, CESA recommends striking “that are signatory to the IBEW” from the language above for construction safety requirements. If deemed necessary, such a requirement can then be set in the program eligibility phase once further evaluation on the benefits has been completed.

CESA appreciates the opportunity to provide these comments and suggestions for improvements to the safety checklist.

Sincerely,

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