



**INTERNATIONAL  
BROTHERHOOD  
OF ELECTRICAL  
WORKERS**

900 Seventh Street, NW  
Washington, DC 20001  
202.833.7000  
www.ibew.org

LONNIE R. STEPHENSON  
International President

KENNETH W. COOPER  
International  
Secretary-Treasurer

January 3, 2022

**VIA EMAIL**

Ms. Amanda Lefton  
Director  
Bureau of Ocean Energy Management  
Department of the Interior  
45600 Woodland Road, VAM-OREP  
Sterling, VA 20166

**Re: Comments on BOEM Docket No. 2021-0078, Atlantic Wind Lease Sale 9 for Commercial Leasing for Wind Power on the Outer Continental Shelf in the Carolina Long Bay Area**

Dear Director Lefton:

The International Brotherhood of Electrical Workers (IBEW) appreciates the opportunity to comment on the Bureau of Ocean Management's (BOEM's) Proposed Sale Notice, *Atlantic Wind Lease Sale 9 (ATLW-9) for Commercial Leasing for Wind Power on the Outer Continental Shelf in the Carolina Long Bay Area (PSN)*.<sup>1</sup>

The IBEW is a labor organization representing approximately 775,000 active and retired members, including approximately 385,000 electrical workers employed in construction who are ready and able to build and maintain the infrastructure necessary to achieve the Administration's clean energy goals. The highly skilled construction tradesmen and women of the IBEW are electrical professionals employed in all facets of electrical construction. They routinely assemble, install, erect, and maintain electrical distribution systems, transmission lines, and all types of power generation equipment.

IBEW members have been involved in the development and successful construction of renewable energy projects, including wind, solar, hydropower, biomass, and geothermal, since they arrived on the market. IBEW electricians performed the onshore construction and transmission interconnect work of the first offshore wind project completed in the United States, Rhode Island's Block Island, which opened in 2016. More recently, IBEW members performed the onshore transmission interconnect work for the first offshore wind farm in federal waters, Dominion Energy's two-turbine Coastal Virginia Offshore Wind (CVOW) pilot project off the Virginia coast, which is scheduled to include more than 200 turbines by 2026.

---

<sup>1</sup> *Atlantic Wind Lease Sale 9 (ATLW-9) for Commercial Leasing for Wind Power on the Outer Continental Shelf in the Carolina Long Bay Area, Proposed Sale Notice*, BOEM Docket No. 2021-0078, 86 Fed. Reg. 60274 (November 1, 2021).





INTERNATIONAL  
BROTHERHOOD  
OF ELECTRICAL  
WORKERS®

Ms. Amanda Lefton  
January 3, 2022  
Page 2

But the IBEW's presence in wind energy is not new. IBEW members have been instrumental in the skilled construction of land-based wind installations for nearly 20 years. Whether on or offshore, the work of wiring, assembling, and cabling wind turbines and connecting them to the grid is an extension of the construction and linework that the IBEW's trained professionals have been performing for over 100 years. While offshore wind projects occur in different environments and involve different materials than onshore construction, the basic work is the same, and the skills required to perform this work are fundamental aspects of the training regimen that IBEW members have been adhering to for generations.

With that background, we offer the following comments on BOEM's proposed sale notice.

BOEM has proposed requiring lessees to "make reasonable efforts to enter into a project labor agreement (PLA) covering the construction stage of any project proposed for the leased area."<sup>2</sup> The IBEW references and fully endorses the comments provided by North America's Building Trades Unions (NABTU) on the PSN for the NY Bight, which urged BOEM to require lessees to use their "best efforts" to negotiate project labor agreements for their construction projects.<sup>3</sup> At a minimum, lessees should be required to "make every reasonable effort" to enter a PLA, as stated in the PSN for the New York Bight.<sup>4</sup> The IBEW believes that utilizing PLAs in the construction of offshore wind infrastructure will ensure that projects are performed by appropriately-trained personnel and carried out in a safe and expeditious manner, which will provide a fair return on investment consistent with the policies set forth in the Outer Continental Shelf Land Act (OCSLA). In our view, using PLAs not only serves the statutory purposes outlined in OCSLA, but can also address BOEM's goals of "expeditious development and potentially more years of operating fee receipts."<sup>5</sup>

As detailed in NABTU's comments on the NY Bight PSN, members of the IBEW and the other building trades unions come to these projects after completing high-level apprenticeships and possessing most of the skills required to construct all segments of an offshore wind farm project: the onshore fabrication, the offshore

---

<sup>2</sup> See *id.* at 60279.

<sup>3</sup> *Atlantic Wind Lease Sale 8 (ATLW-8) for Commercial Leasing for Wind Power on the Outer Continental Shelf in New York Bight, Proposed Sale Notice*, BOEM Docket No. 2021-0033, 86 FR 31524 (June 14, 2021). NABTU's comments on this docket are available at: [https://downloads.regulations.gov/BOEM-2021-0033-0074/attachment\\_1.pdf](https://downloads.regulations.gov/BOEM-2021-0033-0074/attachment_1.pdf)

<sup>4</sup> The PSN for the New York Bight included a lease stipulation which would require lessees to "make *every reasonable effort* to enter into a project labor agreement (PLA) covering the construction stage of any project proposed for the leased area." See 86 FR 31524, 31530. (Emphasis added).

<sup>5</sup> 86 FR 60274, 60279.





INTERNATIONAL  
BROTHERHOOD  
OF ELECTRICAL  
WORKERS®

Ms. Amanda Lefton  
January 3, 2022  
Page 3

erection, and the on- and offshore energy infrastructure. However, to address the different environmental conditions and materials that characterize offshore construction, major wind farm developers are requiring workers employed on these projects to complete, at minimum, Basic Safety Training created by the Global Wind Organization and are demanding on-the-job experience before fully entrusting certain jobs to the American workforce.

To facilitate the necessary workforce development, BOEM should therefore include two specifications in leases: inclusion of a specific phased staffing progression in the PLA and contributions to a dedicated training fund.

*Specified employment progression:* Each lessee must be required to commit to utilizing American workers on the offshore portion of their projects. Recognizing that both safety and on-the-job training may lag behind the beginning of construction, we propose that each PLA specify an on-the-job training progression to prepare American workers to perform offshore work, accompanied by a commitment that as increasing numbers of workers complete this progression, the percentage of hours worked by American workers will increase at designated intervals over the course of the project.

For example, the PLA could provide for 6 weeks of on-the-job training that progresses as follows:

- After successful completion of GWO BST,
- 40 hours of over water "shadowing" of work scope activities, followed by
- 40-80 hours of over water "assisting" with work scope activities, followed by
- 40-80 hours of "supervised" performance of work scope activities, then
- Full performance of work scope activities.

This will ensure that the lessees always have the trained personnel they require while phasing in an increasingly robust American workforce.

*Training:* Training facilities are already being planned and constructed up and down the Eastern Coast. The ARCON Training Center is operating in Salisbury, Maryland, and both Orsted and Vineyard have committed to building their own training facilities (Orsted on Long Island and Vineyard in Massachusetts). But initial training and recertification (every 24 months) comes with a cost – currently estimated at \$1,800 - \$2,400 per person – that workers should not be required to shoulder. Instead, as part of developing this supply chain of American workers, BOEM should require that developers commit to contributing to a fund to support workforce training. At a minimum, the fund should finance the requisite BST





**INTERNATIONAL  
BROTHERHOOD  
OF ELECTRICAL  
WORKERS®**

Ms. Amanda Lefton  
January 3, 2022  
Page 4

training. However, by agreement of the parties, it could also be used to support the on-the-job training proposed above.

Finally, BOEM should only award workforce development bidding credits to developers that can provide concrete plans for workforce training. To effectively carry out the workforce development goals stated in the PSN, the bidding credits associated with workforce development should only be given to developers who will go beyond simply “committing” to funding workforce training, and who can provide detailed, concrete plans to do so at the time of application. The most effective way to achieve this is through the use of a PLA, which ensures construction will be performed by a highly skilled and appropriately trained workforce. Therefore, developers that commit to using a PLA should be awarded additional or premium credits in the multi-factor bidding process. In addition, BOEM could restrict the availability of bidding credits to developers that commit to using Registered Apprenticeship Programs, as well as on-the-job training (such as the 6-week program outlined above) and GWO BST training.

Once again, we appreciate this opportunity to comment and look forward to assisting the Administration in meeting its renewable energy goals.

Sincerely yours,

A handwritten signature in black ink that reads "Lonnie R. Stephenson". The signature is written in a cursive style with a large initial "L".

Lonnie R. Stephenson  
International President

LRS:jrl

