



**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

June 13, 2022

Ms. Patricia Hoffman  
Acting Director  
Grid Deployment Office  
U.S. Department of Energy  
1000 Independence Ave SW  
Washington, DC 20585

**Re: IBEW Comments Responding to Request for Information on  
Establishment of a Transmission Facilitation Program, Docket  
No. 2022-10137**

Dear Ms. Hoffman:

The International Brotherhood of Electrical Workers, AFL-CIO, CLC (IBEW) submits these comments in response to the U.S. Department of Energy's (DOE) Request for Information on the Establishment of a Transmission Facilitation Program (RFI).<sup>1</sup> The IBEW appreciates this opportunity to suggest innovative policy solutions that the DOE can implement to ensure that the Transmission Facilitation Program (TFP) investments support a clean energy future characterized by good union jobs and principles of equity, environmental and energy justice.

Until the passage of the Infrastructure Investment and Jobs Act (IIJA), efforts to efficiently integrate more renewable and low-carbon sources of electricity to the grid have been hampered by the limitations of the United States grid itself. Meaningful upgrades, particularly strategic investments to connect regions, reinforce infrastructure and modernize the grid, have not been made since the 1970s.

The IBEW submits the following comments in response to Question 5 of the RFI, which requests methods and approaches to implementing TFP that amplify and leverage the funding available to accelerate transmission development that will best serve the national interest, including by cost-effectively increasing resilience and reducing greenhouse gas emissions, while promoting economic growth and energy justice.

**A. Background**

The IBEW is a labor organization representing approximately 775,000 active and retired members. Nearly 400,000 of the IBEW's active members are

---

<sup>1</sup> *Request for Information on Establishment of a Transmission Facilitation Program*, 87 FR 29142 (May 12, 2022).





**INTERNATIONAL  
BROTHERHOOD  
OF ELECTRICAL  
WORKERS®**

Ms. Patricia Hoffman  
June 13, 2022  
Page 2

employed in the construction industry, including electrical generation, transmission, distribution and construction line work. Our members are ready and able to build and maintain the necessary infrastructure to achieve the Administration's clean energy goals.

Electrical transmission construction is an extremely safety-sensitive endeavor. Using an untrained workforce has the potential to be catastrophic, resulting in loss of life, injury and significant property loss. Without proper training, high-voltage electrical construction workers face a myriad of safety risks, including electrical shocks, burns and/or electrocution, which is the third leading cause of death in construction.<sup>2</sup> In addition, faulty electrical installations often prove to not only be hazardous, but tremendously expensive, leading to crippling cost overruns for project owners. It is therefore critical that the workers charged with expanding transmission infrastructure have a deep understanding of applicable processes and technology. A carefully balanced system of education, training, and experience is the only method for achieving the highest level of craftsmanship. Fortunately, IBEW members know and understand the inherent risks. The IBEW and its industry partners have been training workers in this high-hazard industry since 1891.

Notwithstanding the inherent dangers of the industry, licensing requirements for individuals performing electrical work are not uniform across the states, and several states do not even have licensing standards for electricians. This means that many jurisdictions throughout the United States have no restrictions whatsoever on the electrical duties one can perform without meeting any experience, safety or academic standards. This is true despite the fact that the number of deaths and injuries of electricians is among the highest in the construction industry and is the craft with the highest level of regulation.<sup>3</sup>

***B. DOE should adopt high road labor standards to ensure successful outcomes and protect the public interest***

The IJA provides that the provision and receipt of assistance for an eligible TFP project shall be subject to "***such terms and conditions as the Secretary deems appropriate*** to ensure the success of the program and protect the interest of the

---

<sup>2</sup> CPWR, *The Construction Chart Book: The US Construction Industry and Its Workers*, 6th ed., at 43 (Feb. 2018), [https://www.cpwr.com/wp-content/uploads/publications/The\\_6th\\_Edition\\_Construction\\_eChart\\_Book.pdf](https://www.cpwr.com/wp-content/uploads/publications/The_6th_Edition_Construction_eChart_Book.pdf).

<sup>3</sup> Morris M. Kleiner and Kyoung Won Park, U.S. Bureau of Labor Statistics, *Monthly Labor Review*, "Life, limbs, and licensing: occupational regulation, wages, and workplace safety of electricians, 1992–2007," (Jan. 2014), <https://www.bls.gov/opub/mlr/2014/article/life-limbs-and-licensing.htm>.





**INTERNATIONAL  
BROTHERHOOD  
OF ELECTRICAL  
WORKERS®**

Ms. Patricia Hoffman  
June 13, 2022  
Page 3

United States.”<sup>4</sup> The statute’s broad language gives DOE ample authority to use the policies discussed below to leverage the TFP’s investments responsibly.

The IBEW, therefore, recommends that DOE include the following labor standards as part of TFP implementation:

### ***1. Apprenticeship utilization***

As part of the application process, DOE should require eligible entities to self-certify that they will utilize contractors and subcontractors who participate in, or commit to participating in, quality registered apprenticeship programs as described below. Such a requirement will address two important DOE goals. First, it will help grow a well-trained and qualified workforce that DOE and recipients of assistance may utilize on future projects. In a recent survey of construction firms across the country, over 70 percent of respondents reported that they anticipate a labor shortage to be the biggest hurdle in coming years.<sup>5</sup> According to the Centers for Disease Control and Prevention, the industry’s average age of retirement is 61, and more than one in five construction workers are currently older than 55. Accordingly, measures to promote quality training for the next generation of electrical workers is critical. Second, the rigorous training workers receive in registered apprenticeship programs will ensure safety and efficiency on DOE projects.

Because of the highly specialized nature of transmission line construction, the IBEW recommends that DOE require eligible entities self-certify as part of the application process that they will utilize contractors who participate in, or commit to participating in, an Electrical Training Alliance Outside Line Apprenticeship program to ensure that a properly trained workforce is available and adequately prepared to meet the demand for this highly skilled electrical construction work.

Data from the U.S. Bureau of Labor and Statistics shows that 34.9 percent of new, untrained construction workers are injured during their first year on the job.<sup>6</sup> Research has shown a *positive exponential relationship* between increased skilled craft labor recruiting difficulty and Occupational Safety and Health

---

<sup>4</sup> Pub. L. No. 117-58, 135 Stat. 429 (codified at 42 U.S.C. §18713)(emphasis added).

<sup>5</sup> See Associated General Contractors of America, [2020 Construction Outlook Survey](#).

<sup>6</sup> Keith Maciejewski, *The Skilled Labor Shortage: Implications for Construction Businesses*, Construction Executive (2020), <https://www.constructionexec.com/article/the-skilled-labor-shortage-implications-for-construction-businesses>.





**INTERNATIONAL  
BROTHERHOOD  
OF ELECTRICAL  
WORKERS®**

Ms. Patricia Hoffman

June 13, 2022

Page 4

Administration (OSHA) incidents.<sup>7</sup> Skilled craft labor variability not only poses major risks to project safety, it also leads to significantly higher growth in cost overrun, time overrun, and reduced productivity.<sup>8</sup> These risk factors compound each other. For example, because projects with skilled craft worker shortages face scheduling constraints, workers are frequently scheduled to work overtime, which “can cause physical fatigue on craft workers [and] seriously affect the implementation of construction site safety.”<sup>9</sup> Empirical studies have shown that registered apprenticeship requirements on public works projects produce significant benefits for procurement authorities because apprentices always work under the supervision of experienced journey-level workers.<sup>10</sup> In addition to mitigating the risk factors discussed above, research has shown that apprenticeship requirements generally increase the number of project bidders and reduce bid costs for affected projects.<sup>11</sup>

In addition, numerous studies of Registered Apprenticeship Programs around the country show that these programs can significantly improve diversity and equity in the workforce.<sup>12</sup> One such study compared union and non-union

---

<sup>7</sup> Hossein Karimi, *Quantitative Analysis of the Impact of Craft Labor Availability on Construction Project Performance*, University of Kentucky (2017), [https://uknowledge.uky.edu/cgi/viewcontent.cgi?article=1059&context=ce\\_etds](https://uknowledge.uky.edu/cgi/viewcontent.cgi?article=1059&context=ce_etds).

<sup>8</sup> *Id.*; see also Allison L. Huang, et al., U.S. Department of Commerce, National Institute of Standards and Technology, Office of Applied Economics, *Metrics and Tools for Measuring Construction Productivity: Technical and Empirical Considerations* (Sept. 2009), [http://www.nist.gov/customcf/get\\_pdf.cfm?pub\\_id=903603](http://www.nist.gov/customcf/get_pdf.cfm?pub_id=903603).

<sup>9</sup> Karimi, *supra* note 18 at 7 (internal citations omitted).

<sup>10</sup> See Washington State Department of Labor and Industry & Washington State Department of General Administration, *Apprenticeship Utilization 2009 Legislative Update* (Dec. 2009); Washington State Department of Transportation, *Apprenticeship Utilization Advisory Committee Report* (Jan. 2008). See also U.S. Office of Management and Budget, *Task Force on Apprenticeship Expansion: Final Report to the President of the United States* (2018), <https://omb.report/icr/201812-1205-001/doc/88448201> (apprenticeship programs increase productivity and are a “key tool for addressing America’s skills gap.”); U.S. Department of Commerce and Case Western Reserve University, *The Benefits and Costs of Apprenticeship: A Business Perspective* (2016), <https://files.eric.ed.gov/fulltext/ED572260.pdf> (apprenticeship programs are cost-effective due to higher worker productivity, improved safety and project quality, reliable project staffing, and reduction in employee turnover).

<sup>11</sup> *Id.*

<sup>12</sup> See, e.g., Frank Manzo and Robert Bruno, *The Apprenticeship Alternative: Enrollment, Completion Rates, and Earnings in Registered Apprenticeship Programs in Illinois*, Illinois Economic Policy Institute (Jan. 2020), <https://illinoisepi.files.wordpress.com/2020/01/ilepi-pmcr->



**INTERNATIONAL  
BROTHERHOOD  
OF ELECTRICAL  
WORKERS®**

Ms. Patricia Hoffman  
June 13, 2022  
Page 5

construction apprenticeship programs in the Portland, Oregon area, and found that union apprenticeship programs provide significantly better outcomes overall for women and people of color compared to non-union programs, and that union programs have greater apprenticeship diversity in terms of both gender and race.<sup>13</sup>

Apprenticeships are vital to creating a strong economy and rebuilding the middle class, and are the most effective, time-tested method of training electrical workers in an industry replete with physical hazards. Utilizing Registered Apprenticeship programs ensures that work is performed by highly skilled, trained personnel and provides a reliable supply of workers that can successfully complete construction projects, thereby ensuring a return on the public investment.

The IBEW understands firsthand the numerous benefits of quality, formalized training in the electrical construction industry. Over 70 years ago, the IBEW and the National Electrical Contractors Association (NECA) developed the Electrical Training Alliance (Alliance).<sup>14</sup> The Alliance has trained and graduated over 350,000 apprentices, making it the largest training program for electrical workers in the nation. The Alliance currently has some 300 construction training centers in operation<sup>15</sup> and makes almost \$200 million in annual investments in apprenticeship training efforts. Such training is provided at no cost to participants

---

[the-apprenticeship-alternative-final.pdf](#) (finding that between 2000 and 2016, more than 74,000 construction apprentices (97 percent) were enrolled in joint labor-management programs, compared to less than 2,000 in employer-only programs, with joint programs enrolling 98 percent of all women, 99 percent of all African American apprentices, 98 percent of all Latino apprentices, and 97 percent of all military veterans); Building Trades of Minnesota, “Registered Apprenticeship in the Construction Trades,” <https://mntrades.org/apprenticeship/> (Approximately 5 percent of the total construction workforce were people of color, compared to 20.5 percent of union construction apprentices; apprenticeship completion rates for minority apprentices increased 339 percent between 2012 to 2019); Lawrence Mishel, Economic Policy Institute, *Diversity in the New York City union and nonunion construction sectors* (Mar. 2017), <https://www.epi.org/publication/diversity-in-the-nyc-construction-union-and-nonunion-sectors/>.

<sup>13</sup> Larissa Petrucci, PhD, *Constructing a Diverse Workforce: Examining Union and Non-Union Construction Apprenticeship Programs and their Outcomes for Women and Workers of Color*, University of Oregon, Labor Education and Research Center (2021), [https://cpb-us-e1.wpmucdn.com/blogs.uoregon.edu/dist/a/13513/files/2021/11/Constructing\\_A\\_Diverse\\_Workforce.pdf](https://cpb-us-e1.wpmucdn.com/blogs.uoregon.edu/dist/a/13513/files/2021/11/Constructing_A_Diverse_Workforce.pdf).

<sup>14</sup> Electrical Training Alliance, <https://www.electricaltrainingalliance.org/training/outsideLineman>.

<sup>15</sup> A map of the joint training programs of the National Electrical Contractors Association (NECA) and the IBEW is available at <http://www.electricaltrainingalliance.org/locateaTrainingCenter/Inside>.





**INTERNATIONAL  
BROTHERHOOD  
OF ELECTRICAL  
WORKERS®**

Ms. Patricia Hoffman  
June 13, 2022  
Page 6

or taxpayers. Apprentices learn while they earn, and also receive health and retirement benefits.

To combat the inherent safety risks of electrical construction and ensure that projects are completed successfully, journey-level IBEW members obtain numerous safety and technical certifications as part of their apprenticeship training. IBEW apprenticeship students receive hands-on experience and electrical, mechanical and construction theory classroom fundamentals. The typical IBEW apprenticeship program is three to five years in length. Apprentices also train in blueprint reading, mathematics, electrical code requirements, safety, first aid, conduit installation, wiring, outlets, and switches. Apprentices furthest along in their training work on planning the construction and testing the operation of an entire electrical system. IBEW electricians also obtain additional qualifications in various continuing education courses due to the ever-evolving technological advancements and safety imperatives that frequently arise within the electrical field.

Outside Lineworkers ensure that electrical power is distributed adequately from power plant generation facilities to end-users. They are responsible for installing and maintaining all types of power transmission and distribution systems for industrial, commercial, and residential markets. IBEW members jointly trained by the IBEW and NECA in Electrical Training Alliance Outside Line Apprenticeships learn to employ safe practices while working under the supervision of a Journey-Level Worker Lineman to construct electrical transmission lines and related facilities. They also install and maintain poles and towers and underground systems. Outside Lineworkers must develop climbing skills, as much of their work is atop utility poles and transmission towers. Lineworkers often work in bad weather and storms to maintain electrical power for homes, hospitals, factories and schools.

The U.S. Department of Labor certifies national requirements for outside line apprenticeship standards. These national standards provide standardized selection procedures, specify topics to be covered and hourly requirements, and include equal employment opportunity and affirmative action policies to which participating employers must adhere. The national standards provide consistency across all outside-line apprenticeship programs sponsored by the IBEW and NECA. Local apprenticeships must conform to the national standards and be properly registered by the host IBEW/NECA joint labor-management committee.

Applicants are required to take a written aptitude test to gain entry into the program. Each outside line apprentice completes a minimum of 7,000 hours of reasonably continuous supervised employment on-the-job training. To be advanced





**INTERNATIONAL  
BROTHERHOOD  
OF ELECTRICAL  
WORKERS®**

Ms. Patricia Hoffman  
June 13, 2022  
Page 7

through the different training phases, the apprentice must have completed on-the-job hours and satisfactory progress in related instruction.

Individuals with specific qualifications or from certain targeted populations are not required to apply through the standard methods. They may be allowed to bypass specific minimum requirements and go directly to an oral interview. This includes applicants with military experience, a specified number of hours of industry experience, individuals who have completed a quality pre-apprenticeship training program, and individuals who have completed an area joint apprenticeship training committee or Electrical Training Alliance approved Line College/Line School program focusing on the electrical line construction industry.

Topics covered in Outside Line Apprenticeship programs include, but are not limited to, OSHA and other safety training; climbing techniques and safeguards; electrical grounding; distribution analysis, testing and repair; mathematics; electrical theory; line conductor installation; rigging; surveying; transformers; live line maintenance; substations; systems analysis, repair and certification; working with alternative energy sources; and power quality. In addition, Outside Line apprentices are trained in the assembly and erection of steel towers, including cellular towers, placement of footings and materials; attachment of insulators and the stringing, splicing, dead-ending, armor rodding, and clipping of conductors; framing, erection, and guying of wood-poles and the installation of hardware insulators and conductors thereon; assembly and erection of steel and wood components and the installation and connection of busses, grounds, switches, circuit breakers, transformers, regulators, and other substation equipment.

Under the Outside Line Apprenticeship national standards, employers are responsible for instructing apprentices in safe and healthy work practices. They must ensure that apprentices are trained in facilities and other environments that comply with applicable OSHA standards<sup>16</sup> or State or area-wide standards that are at least as effective as the Federal standards. Notably, OSHA requires “competent persons” to be assigned to certain construction operations, including electrical construction. An OSHA “competent person” is defined as “one who is capable of identifying existing and predictable hazards in the surroundings or working

---

<sup>16</sup> The Occupational Health and Safety Administration’s construction standards, codified at 29 C.F.R. pt. 1926, apply to every employment and place of employment of every employee engaged in construction work, *id.* § 1910.12(a). “Construction work” means work for construction, alteration, and/or repair, including painting and decorating, *id.* § 1910.12(b), and **expressly includes the erection of new electric transmission and distribution lines and equipment, and the alteration, conversion, and improvement of the existing transmission and distribution lines and equipment**, *id.* § 1910.12(d), § 1926.950(a)(1).





**INTERNATIONAL  
BROTHERHOOD  
OF ELECTRICAL  
WORKERS®**

Ms. Patricia Hoffman  
June 13, 2022  
Page 8

conditions which are unsanitary, hazardous, or dangerous to employees, and who has the authorization to take prompt corrective measures to eliminate them." 29 C.F.R. § 1926.32(f). Through training and/or experience, a competent person is knowledgeable of applicable standards, can identify workplace hazards relating to the specific operation, and has the authority to correct them. Some standards add additional specific requirements that the competent person must meet.<sup>17</sup> In other words, a competent person is one who is thoroughly knowledgeable about the particular type of construction operation and has the authority to stop operations if they determine it has become unsafe. The Alliance's Outside Line Apprenticeship programs are one-of-a-kind – they are the only DOL-registered apprenticeship programs that recruit, train, and certify “competent persons” in electrical transmission work.

## ***2. Single-craft labor agreements***

To ensure that TFP projects are completed on time, with the highest degree of quality, and in a cost-effective manner, contractors and subcontractors engaged in the construction of such projects should be required to enter into single-craft labor agreements with IBEW locals.

Such agreements will provide stability to TFP projects by standardizing the terms and conditions of employment for electrical workers on the project, and they will help contractors meet deadlines by guaranteeing a steady supply of highly skilled labor. A recent study found that contractors who are signatories to craft labor agreements are 21 percent less likely to experience delays in project completion times due to worker shortages and 14 percent less likely to have trouble filling craft worker positions. In addition, signatories were 8 percent more likely to add workers over the past year, indicating a stronger ability to staff up and recruit new workers, even in a tight labor market. Conversely, nonunion firms reported greater difficulty in filling craft worker positions: they were 27 percent work likely to report that their local pipeline for supplying well-trained craft workers was “poor” compared to signatory contractors.<sup>18</sup> Such agreements will also prevent

---

<sup>17</sup> [https://www.osha.gov/competent-person#:~:text=Anpercent20OSHApercent20percent22competentpercent20personpercent22percent20is,CFRpercent201926.32\(f\)percent5D](https://www.osha.gov/competent-person#:~:text=Anpercent20OSHApercent20percent22competentpercent20personpercent22percent20is,CFRpercent201926.32(f)percent5D). (Last accessed June 10, 2022).

<sup>18</sup> Frank Manzo, Larissa Petrucci, and Robert Bruno, *The Union Advantage During the Construction Labor Shortage: Evidence from Surveys of Associated General Contractors of America Member Firms* (May 10, 2022), <https://illinoisepi.files.wordpress.com/2022/02/ilepi-pmcr-construction-labor-shortage-agc-report-final.pdf>.







**INTERNATIONAL  
BROTHERHOOD  
OF ELECTRICAL  
WORKERS®**

Ms. Patricia Hoffman  
June 13, 2022  
Page 9

work stoppages with no-strike, no-lockout, and speedy dispute-resolution provisions.

Given the severe and inherent safety risks involved with performing transmission construction work, such agreements should also require contractors to utilize or participate in Outside Line Registered Apprenticeship Programs. As discussed above, these programs are one-of-a-kind because they are the only registered apprenticeships that recruit, train, and certify “competent persons” in electrical transmission work. While multi-craft project labor agreements are appropriate and powerful tools elsewhere, projects assisted by the TFP are highly specialized electrical jobs that should instead be subject to a single-craft (electricians) pre-hire collective bargaining agreement. As detailed above, IBEW electricians are the only workers with the appropriate training to safely and successfully perform this work.

Such an agreement would benefit both contractors and communities by engaging a local workforce that is undergoing or has undergone rigorous training and is paid family-sustaining wages.

### ***3. Responsible contracting requirements***

Despite the many protections to ensure federal contractors pay decent wages, provide safe workplaces, and respect workers’ rights on the job, the government frequently contracts with companies with long records of workplace violations.<sup>19</sup> Contracting with such companies “frequently results in poor performance of federal contracts and waste of public resources.”<sup>20</sup> Conversely, policies that “increase compliance with worker protection laws may result in improved contract performance and support good value for public investments.”<sup>21</sup> Responsible contractor standards are a powerful tool to ensure work quality and safety, and avoid using public funds to support low-wage jobs.

The IBEW urges DOE to adopt responsible contracting requirements to ensure that the TFP funds projects developed by responsible companies with

---

<sup>19</sup> Karla Walter, et. al, *Federal Contractors are Violating Workers’ Rights and Harming the U.S. Government*, Center for American Progress Action Fund (Jan. 21, 2022), <https://www.americanprogressaction.org/issues/economy/reports/2022/01/21/181133/federal-contractors-violating-workers-rights-harming-u-s-government/>.

<sup>20</sup> *Id.*

<sup>21</sup> *Id.*





**INTERNATIONAL  
BROTHERHOOD  
OF ELECTRICAL  
WORKERS®**

Ms. Patricia Hoffman  
June 13, 2022  
Page 10

sufficient qualifications, resources and personnel for successful project delivery. In addition, by ensuring that contractors have the proper certifications to perform work in a given jurisdiction, these requirements can also have the effect of increasing the use of local labor.

The requirements should include, at a minimum:

- a. Labor standards compliance self-certification and exclusion of serial law violators: project owner/contractor and subcontractors must attest, under penalty of perjury, that they have had no project defaults or law violations of any kind that have resulted in penalties, back pay, etc. over a specified amount (i.e., \$5,000) within the last three (3) years.
- b. Use of a Registered Apprenticeship Programs that train and certify OSHA “competent persons” in electrical transmission construction. This will ensure all construction work is performed by appropriately skilled and trained personnel, leading to successful and timely project delivery.
- c. Self-certification by contractors and subcontractors that they possess all necessary licenses, registrations, certificates or permits as required by applicable state or local law.
- d. Self-certification by contractors and subcontractors that they possess all technical and industry-specific qualifications, equipment, financial resources and personnel needed complete the project successfully.
- e. Monitoring and enforcement provisions, including disqualification/debarment and penalties for those that submit false or inaccurate information.

#### ***4. Preference for supporting quality pre-apprenticeship programs***

In addition, we recommend that DOE give preference to eligible entities that commit to funding or otherwise supporting quality pre-apprenticeship programs with organized labor to target historically marginalized community groups.

As noted above, the Alliance was created over 70 years ago as a joint





**INTERNATIONAL  
BROTHERHOOD  
OF ELECTRICAL  
WORKERS®**

Ms. Patricia Hoffman  
June 13, 2022  
Page 11

training program between the IBEW and NECA and has developed into the largest apprenticeship and training program of its kind, having trained over 350,000 apprentices to journeyman status through local affiliate programs. The Alliance sponsors its own Pre-Apprenticeship Program that increase the participation rates of underrepresented and historically marginalized populations in IBEW/NECA Registered Apprenticeship Programs. The program targets women, people of color and veterans. The program analyzes pre-apprentices' deficiencies in core subject areas through standardized assessment instruments and individualized instruction. Once identified, individuals are given assistance to help prepare for the rigors of the 5-year registered apprenticeship program. Training involves basic electrical-industry standards and job-readiness skills. ETA's network of over 100 industry partners provides workforce knowledge and on-the-job work training to prepare pre-apprentices to become apprentices in Registered Apprenticeship Programs.

IBEW also partners with other pre-apprenticeship programs focused on creating career pathways into the building trades for underserved populations. For example, Pathways to Apprenticeship, Inc. in Syracuse, New York, works to assist individuals from low-income communities, including the formerly incarcerated, to be admitted into a building trades apprenticeship program.<sup>22</sup> Currently, 23 percent of program participants are women, and 93percent are people of color.

Pre-apprenticeship programs offer a direct entry point into apprenticeship programs upon completion. They thus can be an effective vehicle to streamline the recruitment process and provide a clear pathway for underrepresented populations to secure apprenticeships and career placements.

### **C. Conclusion**

A substantial body of research shows that the benefits of labor standards outweigh the costs.<sup>23</sup> Studies on the actual impacts of increases in minimum and living wages have found the price and employment effects to be negligible, while worker incomes have been substantially improved. In construction, numerous studies have shown that mandates for high-road labor standards have not raised costs where they have been implemented, as productivity improvements make up for higher wages and benefits. Moreover, cost increases due to higher compensation may lead to negligible or minimal overall cost increases, since labor costs are often

---

<sup>22</sup> Pathways to Apprenticeship, <https://p2atrades.org/>.

<sup>23</sup> See, e.g., Carol Zabin and Jenifer MacGillvary, *Putting California on the High Road: A Jobs and Climate Action Plan for 2030* (June 2020), <https://laborcenter.berkeley.edu/wp-content/uploads/2020/08/Chapter-2-Demand-Side-Workforce-Policy-Levers-Putting-California-on-the-High-Road.pdf> (internal citations omitted).





**INTERNATIONAL  
BROTHERHOOD  
OF ELECTRICAL  
WORKERS®**

Ms. Patricia Hoffman  
June 13, 2022  
Page 12

a small percentage of production costs.

Meeting the ambitious climate imperatives of the Biden administration will be determined by how quickly and efficiently renewable and low-carbon energy sources reach the public. This depends on a competent, timely, and successful buildout of the nation's aging transmission infrastructure. IBEW line workers know and understand the grid's complexities because they built it. Our highly specialized training programs and recruitment of underserved communities ensure safety, equity, and environmental justice remain guiding principles, along with reliability, professionalism and dedication to shared economic growth through worker empowerment.

Once again, we appreciate this opportunity to comment and look forward to assisting the Department of Energy in expanding our nation's transmission infrastructure.

Please note that the IBEW's principal point of contact on this matter is Taylor Waites, who can be reached at (202) 728-6046 or by email to [Taylor.Waites@ibew.org](mailto:Taylor.Waites@ibew.org).

Sincerely yours,

A handwritten signature in black ink that reads "Lonnie R. Stephenson". The signature is fluid and cursive.

Lonnie R. Stephenson  
International President

LRS:efw

