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August 13, 2021

**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 New York Bight PSN  
Docket No. BOEM-2021-0033**

Dear Director Lefton:

The International Brotherhood of Electrical Workers (IBEW) appreciates the opportunity to comment on the Bureau of Ocean Management's (BOEM's) *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*.

The IBEW is a labor organization with approximately 775,000 retired and active members, including approximately 385,000 electrical workers employed in the construction industry. The IBEW's highly skilled construction tradesmen and women 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 like solar, hydropower, wind, biomass, and geothermal since their introduction to the United States energy market. For example, IBEW electricians performed the onshore construction and transmission interconnect work of the first Offshore Wind Project to be completed in the United States, Rhode Island's Block Island, which opened in 2016. IBEW members also recently 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.

But the IBEW's presence in wind energy is not new. IBEW members have been providing critical construction know-how to land-based wind installations for nearly 20 years. On-shore or off, the work of wiring, assembling, and cabling turbines and connecting them to the grid are fundamental skills to the IBEW's trained professionals. The task of powering a wind turbine is an extension of the construction and linework that we have been performing for more than 100 years.





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Constructing offshore turbines occurs in a different environment and involves different materials than onshore construction, as marine cables differ from land-based cables, but the basic work is the same, whether performed off the coast of Virginia or in an Iowa cornfield. The principles required are fundamental to the training and safety regimen to which IBEW members have been adhering for generations.

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

The IBEW fully endorses the comments of North America's Building Trades Unions (NABTU), urging BOEM to require lessees to use their best efforts to negotiate PLAs for their construction projects. In our view, using PLAs not only serves the statutory purposes outlined in NABTU's comments but can also address BOEM's goal of creating a "durable domestic supply chain conducive to prompt and orderly development of the Lease area and renewable energy development on the OCS." Building the requisite "domestic supply chain" means not only developing manufacturing capacity and equipment but also ensuring a dependable supply of specially trained American workers.

As detailed in NABTU's comments, 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 erection, and the on- and offshore energy infrastructure. However, to address the different environmental conditions and materials that characterize offshore construction, the major wind farm developers are requiring workers employed on these projects to secure 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.

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<sup>1</sup> GWO's BST consists of 40 hours of training in first aid, manual handling, fire awareness, working at heights, and sea survival.



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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 \$ 1800 - \$ 2400 per person -- that the 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 training. However, by agreement of the parties, it could also be used to support the on-the-job training proposed above.

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

Sincerely yours,

Lonnie R. Stephenson  
International President

LRS:jrl