

From: [Alex Lantsberg](#)
To: [Pollock, Jeremy \(BOS\)](#)
Subject: Comments on BESS report
Date: Friday, September 20, 2024 10:30:11 AM
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Jeremy,

Thank you for the opportunity to provide comments on this report. This summarizes the comments I shared with you in the document.

While this study represents an important step towards accelerating the adoption of Battery Energy Storage System, the authors make some fundamental errors that have significant policy implications. In short, if one doesn't accurately describe the industry they're trying to affect then the interventions will not work and may in fact be harmful. I will specifically focus on the study's workforce and training elements

- 1. Section 13 ignores the current availability of a skilled electrical workforce that isn't working because of the economic impacts of the pandemic and changes in San Francisco's market conditions.** Because apprenticeship programs are *DEMAND BASED* an overhang of unemployed journey-level workers reduces demand for apprentices. Even under those circumstances, with the dislocations of the COVID pandemic increasingly behind us Local 6 has initiated two apprenticeship cohorts in 2024 and is planning a third for later this year. A date will be announced shortly.
- 2. The most direct way to expand workforce development opportunities in the renewable energy sector is to extend the SFPUC's water and wastewater PLAs to energy projects (p. 30).** This will both send signals to the market that these workers are needed so that the program will adjust accordingly and well as provide a mechanism for the City to take an active role in expanding the skilled and trained electrical workforce.
- 3. There is no need for standalone training on BESS (p. 31-32).** SFECI again underscores that BESS work is a component of electrical work which is already covered in joint apprenticeship programs via ESAMTAC modules and general electrician education. The California Contractors State Licensing Board has recognized this fact and promulgated regulations accordingly. Similarly, as shown in research by the Don Vial Center for the Green Economy, the occupation of solar installer is limited and doesn't provide opportunity to work across the electrical and renewable energy sector; a general electrician can do solar but solar installers can't do electrical work. Simply fusing a narrow BESS specialization without the complete electrical training limits both economic and career opportunities.

4. The study is unclear how the absence of Virtual Power Plant incentives creates “substantial... economic benefits and sustainability goals” for San Francisco residents.

5. **Prevailing wage regulations create opportunities for apprentices (p. 35).** The authors betray a fundamental misunderstanding of prevailing wage regulations. Registered apprentices are paid according to the prevailing wage rates established by DIR regardless of whether they’re working on public works project or under a union agreement. Rather than limiting opportunities for apprentices, adding an overall prevailing wage requirement, which embeds apprentice utilization ratios in the regulation, creates opportunities for electrical apprentices.

Thank you for your consideration. SFECI looks forward to engaging with both LAFCO and SFPUC to ensure that battery energy systems are safely integrated into San Francisco’s built environment and that this expands economic opportunities for electrical workers.

 The logo is circular with a black border. Inside the border, the words "SAN FRANCISCO" are written in white at the top and "ELECTRICAL CONSTRUCTION INDUSTRY" at the bottom. In the center, there is a yellow lightning bolt striking a bridge structure.	<p>Alex Lantsberg Director of Research & Advocacy</p> <p><u>San Francisco Electrical Construction Industry</u> 55 Fillmore St. San Francisco, CA 94117 Mobile 415.794.2539 <u>@ECI415</u></p> <p>FACTORY BUILT ERRORS: <u>www.honestbuilderscoalition.org</u> EV CHARGER REBATE: <u>www.skilledandtrained.com</u></p>
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