

STATE OF NEW YORK
PUBLIC SERVICE COMMISSION

Case 10-E-0285 – Proceeding on Motion of the Commission to Consider Regulatory Policies Regarding Smart Grid Systems and Modernization of the Electric Grid

Case 09-M-0074 – In the Matter of Advanced Metering Infrastructure

REPLY COMMENTS OF UTILITY WORKERS UNION OF AMERICA, AFL-CIO, LOCAL 1-2 AND INTERNATIONAL BROTHERHOOD OF ELECTRICAL WORKERS, LOCAL 97 TO THE RESPONSES ADDRESSING THE QUESTIONS IDENTIFIED IN THE ORDER INSTITUTING INQUIRY INTO SMART GRID, ISSUED AND EFFECTIVE JULY 16, 2010

Pursuant to the Order Instituting Inquiry Into Smart Grid, Issued and Effective July 16, 2010, Utility Workers Union of America, AFL-CIO, Local 1-2 (“Local 1-2”) and International Brotherhood of Electrical Workers, Local 97 (“Local 97”) (collectively “Local Union”) through the undersigned consultant, respectfully provides the following Reply Comments pertaining to the responses addressing the questions identified in the Order Instituting Inquiry into Smart Grid (“Inquiry Order”) Issued and Effective July 16, 2010.

Local 1-2 represents the utility workers employed by Consolidated Edison Company of New York, Inc. who are instrumental in providing electric service to New York City and Westchester County. Local 97 represents the utility workers employed by Niagara Mohawk Power Corporation who are instrumental in providing electric service to communities in upstate New York. Both Locals have a vested interest in providing safe, adequate and reliable electric service to their employers’ customers in the State of New York.

Local Union believes that with the advent of the Smart Grid, the electric utility industry is entering into a period of dramatic transformation. For the Smart Grid to be a success, utilities will place more reliance on technology in their provision of electric service to customers. Increased use of technology by utilities requires the development of additional resources including knowledge, skills and abilities that are different from those resources used in the recent past to provide safe, reliable and adequate electric service. To provide safe, reliable and adequate electric service now, and in the future, will require a convergence and interoperability of communications, information and energy systems that could only be operated efficiently and competently by the utilities' workforces that acquire new knowledge and skills.

In the responses submitted to the Commission pursuant to the Commission's Inquiry Order, only one responder, Central Hudson Gas & Electric Corporation, very briefly touched on training staff on operational and procedural changes and preparing the workforce for the evolution of smart technologies.¹ The Local Union believes that preparing the workforce with both traditional and new knowledge and skills will be absolutely necessary to deploy smart grid technologies, while maintaining an aging electric infrastructure.

Since 40% to 50% of the workforce at the utilities in New York will be eligible for retirement or are expected to leave the electric industry by the middle of this decade, the Local Union believes that it is of utmost importance for New York utilities to hire and train new members of the workforce to transition to a smart grid. This situation has been recognized by a number of utilities in the United States and Canada, and several are doing something about it. For instance, Duke Energy has requested and received financial assistance in improving the knowledge, skills and abilities of its employees. In April of this

¹ Case 10-E-0285 Response of Central Hudson at 6 and 14 of the .pdf document.

year, it received a financial reward from the U.S. Department of Energy and is currently developing training plans and programs to equip both its existing and new employees to support its grid modernization plans. In addition to Duke Energy, training grants were also made to Florida Light and Power, Pepco Holdings and Mississippi Power Company.²

In Canada, Toronto Hydro Electric System launched its own in-house apprenticeship training program which includes a four-and-a-half year apprenticeship. Toronto Hydro Electric System has a workforce with an average age of close to 60 years old, not unlike the electric utilities in New York. In its 2009 corporate responsibility report, it noted that despite the challenge of the global recession, with the approval of the Ontario Energy Board, Toronto Hydro continued to add to its workforce in order to deliver on its goal of modernizing the utility and also to replace ‘baby boom’ generation employees, 600 of whom are expected to retire in the coming nine years. Over 40 percent of the potential retirements will occur in supervisory, engineering, skilled electrical trades and technical system planning positions.³

Blair Peberdy, Vice-President of Communications and Public Affairs at Toronto Hydro said that it is critical for the Company to start to recruit younger employees, specifically into the electrical trades, the skilled trades. Blair Peberdy also said that Toronto Hydro has to have these younger employees on the job while these older workers are still here so that there would be a knowledge transfer and a safe transition from an aging workforce to a younger one. The Ontario Energy Board agreed with the utility’s approach, and Toronto Hydro set up its own trades training facility and gained certification from the Ontario government.⁴

² WWW.INTELLIGENTUTILITY.COM /// SEPTEMBER/OCTOBER 2010 at 30.

³ *ibid.* at 29.

⁴ *ibid.* at 29-30.

CONCLUSION

For the reasons stated above, Local Union respectfully requests that the Commission actively encourage and support New York electric utilities in their development of resources including the technology knowledge, skills and abilities of their workforces to successfully transition to the smart grid. This development should include, but not be limited to, the recruitment of younger workers into the skilled electrical trades and the initiation of training plans and programs, including apprenticeship programs, that would equip both existing and new employees to support and maintain the utilities' aging infrastructure and their future smart grid operations.

Dated: October 15, 2010
Ridgefield, Connecticut

By: /s/ Richard J. Koda
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cc: Active Parties List as of 10-14-10