

Hon. Kathleen H. Burgess
Secretary to the Commission
New York State Public Service Commission
Empire State Plaza
Agency Building 3
Albany, NY 12223-1350

RE: Utility Staffing Audit 13-M-0449

Dear Secretary Burgess,

I am writing today to request time sensitive inclusion into the PSC Staffing Audit of the following documented reports that address staffing shortages in the NYS Utility Industry. We are further concerned with the additional expense and dramatic reductions in a trained and dedicated workforce due to the unprecedented outsourcing of traditional utility work. This imposes unnecessary additional costs to the customer and exposes the customer to risks of system reliability absent a workforce dedicated exclusively to day to day and emergency response within NYS franchise areas:

- **NY Transco FERC filing for Energy Highway PSC 12-T-0502 Dec. 4th, 2014**

"...shortages of skilled workers...potential difficulties in scheduling work crews, all contribute to substantial project completion risks."

- **NYS Moreland Commission Utility Storm Preparation and Response June 22, 2013**

Workforce Deficits and Adverse Impacts on Storm Response: *"Severe storm events have highlighted longstanding, industry-wide problems with aging infrastructure and personnel. According to a survey conducted by the Center for Energy Workforce Development, the size of the industry workforce has decreased by 11,000 jobs since 2009...", "...fewer workers must perform even more work during storm response and restoration."*

- **Liberty Auditing Utility Consultants – Dec/2013 Audit results of upstate NY Utility**

"Auditors repeatedly said and suffered from staff shortages; To compensate for a shrinking work force, the companies have made increasing use of outside contractors, in some cases employing them much more

than other utilities or for jobs that other companies do in-house. The problem, according to auditors: Outside contractors are usually more expensive.”

- **NYS Energy Highway Blueprint, 2012**

Support Workforce Development for the Energy Industry *“Despite Utility advancements in workforce productivity, additional skilled workers are needed, and fully developing workers with the necessary skills requires years of training.”*

I urgently appeal to the NYS PSC to address and correct the staffing shortages and look forward to your thoughtful response.