

**COMMENTS FROM THE CENTER FOR ENERGY WORKFORCE DEVELOPMENT REGARDING THE U.S.
DEPARTMENT OF ENERGY'S PROPOSED INFORMATION COLLECTION REQUEST ON THE UNITED STATES
ENERGY AND EMPLOYMENT REPORT SURVEY**

The Center for Energy Workforce Development (CEWD) appreciates the opportunity to comment on the Department of Energy's (DOE) Proposed Information Collection Request on the U.S. Energy and Employment Report Survey published on May 28, 2024. DOE invited public comments on the practical utility of the extended information collection, the accuracy of the agency's estimated burden, and ways to enhance the quality, utility, and clarity of the collected information.

I. IDENTIFICATION OF FILING PARTY

The Center for Energy Workforce Development (CEWD) is a non-profit consortium of more than 140 energy companies, associations, unions, educational institutions, labor, and government entities working in partnership to ensure a skilled, diverse workforce pipeline for the energy industry. Given its reach and impact, CEWD has an intimate understanding of the risks and opportunities to the energy workforce. CEWD has been reporting on demographics of the workforce bi-annually since 2006 and has conducted the [Gaps in the Energy Workforce Pipeline Report](#) for over 15 years.

CEWD supports energy employers, primarily utilities, representing an estimated 85% of the utility workforce. We also serve as the workforce development hub for 10 trade associations in the sector including Association of Energy Service Providers, American Gas Association, American Public Power Association, American Public Gas Association, Distribution Contractors Association, Edison Electric Institute, EPRI, the INGAA Foundation, National Rural Electric Cooperatives Association, and the Nuclear Energy Institute. Primary respondents to our survey include Investor-Owned Utilities, but several of our partner organizations, including NRECA, APPA, and APGA have prioritized engagement from those they represent to ensure our workforce survey includes greater data from cooperatives and public power and gas companies. Further, NEI uses CEWD's survey instrument to collect proprietary information used by all the nation's Chief Nuclear Officers, including workforce age, years of service, diversity metrics, and attrition.

The DOE, through its proposed information collection, asks interested persons to provide ways to enhance the quality, utility, and clarity of the collected information. Consistent with this directive, CEWD will now dedicate the remainder of these comments to providing examples of key data points, that if included in the USEER, will enhance the overall accuracy, relevance, and impact of the report, and minimize engagement burden by industry employers.

II. KEY CEWD DATA FOR INCLUSION IN THE USEER

As a national, neutral, non-profit workforce intermediary for the energy sector, CEWD respectfully requests the U.S. Department of Energy include additional utility workforce focused information in future USEER research cycles. Our bi-annual study, newly named the Energy Workforce Reportⁱ, explores the size of the utility workforce, demographic composition, forecasted retirements, and attrition data to support industry companies with their strategic workforce planning. In an effort to reduce reporting burdens for companies and ensure more comprehensive and insightful data for public and private stakeholders, we ask that the following data points, which utilities have depended on CEWD to collect, be aggregated into the USEER.

Summary of Requested Areas of Data Inclusion

- 1) Specific data (e.g. turnover, attrition, age, diversity, years of service) within the utility workforce, especially for positions utilities have determined to be key roles including lineworkers, engineers, power plant operators, gas technicians and technicians. (See survey instruments for examples of what CEWD has historically reported on. We believe much of that may be currently available through USEER but may need to be cross-tabbed for insights.) Additionally, more specific data related to recruitment, retention, and training of cyber-security professionals is needed as the industry prepares for the shifting security landscape and the potential impacts to grid reliability.
- 2) Hiring forecast data on a three-five-year lookout would significantly enhance the quality of the USEER. This data could be organized by state and/or region, to support sector-wide local, tactical workforce planning among employers, labor, educators, workforce systems and others responsible for development of the talent pipeline. We recognize a value for this information for both utilities and for the sector as a whole so stakeholders can represent sector-wide needs and work toward collaborative solutions. Moreover, new energy legislation and new legislation being considered, that focuses on forecasting for hiring becomes more critical for workforce development strategies.
- 3) There is also an immediate need for data on the nuclear workforce. One perceived gap with the USEER report is that it shows data for the “EPG Nuclear” (electric power generation), but there is a lack of clarity in the current ask by some companies. For instance, questions have arisen on reporting for corporate and commercial. Additional requests in this area will be recognized in our existing survey instrument, though some will need to be shared directly as some of the data is not publicly available.
- 4) Greater representation of the supplemental workforce that is increasingly important within the evolving energy workforce landscape is paramount to sustaining grid operations through the coming retirement of existing workers, including those on the construction side of the business, but also those involved with weatherization, energy efficiency, and electrification of transportation.
- 5) As employers work to diversify their workforce, we would welcome the opportunity to have greater clarity on the diversity of the skilled labor force.
- 6) While CEWD has not collected wage and salary information, we do recognize the need for this information and we hope USEER will once again collect and publish data in this area.

III. CONCLUSION

As the Department transitions from its historic research-oriented work and expands to meet today's demands for the development of a skilled, diverse energy workforce, we recognize the importance of building on the USEER's historic reporting to ensure essential data on industry jobs to support a wide-range of stakeholders for whom forecasting, and evaluation is essential. We hope the Department will consider absorbing reporting on some of the information deemed useful to utility employers and help them reduce their paperwork burden in the process.

ⁱ 2023 Energy Workforce Report, Center for Energy Workforce Development <https://cewd.org/about/gaps-in-the-energy-workforce-pipeline-survey-results/>