



Contractors State License Board
Legislative Committee
David Fogt, Registrar of Contractors
David.Fogt@cslb.ca.gov

Dear Chair Ruane, Honorable Members of the Legislative Committee, and Registrar Fogt;

CALSSA appreciates that the Contractors State License Board is working to develop a reasonable alternative to the devastating, unjustified, and illegal proposal to entirely prohibit solar contractors from installing Battery Energy Storage Systems with their qualified workforce—work that they have been safely performing under the C-46 license classification for over 40 years.

It was unfortunate that when the Registrar invited CALSSA, IBEW, and NECA to discuss staff's proposed alternative regulation, IBEW and NECA responded by submitting a 25-page letter written by their attorneys. That is not a very productive beginning to assist CSLB in developing a regulation that could be supported by all parties, as the Board requested. Nevertheless, we agree with IBEW on several points and remain hopeful that if the parties focus on a common-sense regulation, we can come to agreement on proposed language.

We were prepared to submit comments on staff's proposed alternative regulation last week, but given that IBEW has rejected that alternative, we are switching gears to respond to IBEW's proposal, which was provided to us on January 19th. I hope you understand that we were not able to turn around a response in two days, by January 21st, for consideration by the Legislative Committee at their January meeting as the Registrar requested.

We appreciate the Chair's willingness to hold another meeting in the next month or so to allow the parties time to try to reach an agreement. CALSSA will submit modified draft regulatory language that builds on what IBEW submitted shortly. We would welcome a meeting with representatives of the stakeholders and CSLB to help move discussions along in a productive and expedited manner.

Sincerely,

A handwritten signature in black ink, appearing to read "Bernadette Del Chiaro".

Bernadette Del Chiaro, Executive Director
California Solar and Storage Association