IBEW 357

IBEW LOCAL 357

SERVING SOUTHERN NEVADA SINCE 1931

Al D. Davis
Business Manager / Financial Secretary

Charles T. Stetson
President

Nevada Energy Director
Nevada State Office of Energy
755 N. Roop St. Suite 202
Carson City, NV 89701

November 8, 2013

Dear Director,

As a follow up to October 24th work session on Proposed Regulation of the Director of the Office of Energy LCB File No. RO65-13, IBEW local 357 would like to submit in writing the concerns we have with some of the proposed changes.

Section 2. Paragraph 2(a) data system testing, surveying, grading and pad certification should be removed from this section as they are part of the "Construction of the Facility". All of these items are post engineering and are not part of "Field development or preparatory work".

Section 18, Paragraph 4, we disagree with any changes to this section that weakens the accountability of the contractors. Calculation of the average hourly wages on a weekly basis has been fair and protects all Nevadans interests. The regulation should remain as originally written.

We feel the language outlined above is in direct conflict with the purpose of the law and was not the intention of the Legislature when they passed AB239.

We will be happy to work with the Director and his staff to address these issues.

Sincerely,

Al D. Davis
Business Manager / Financial Secretary
IBEW Local 357

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