



March 6th, 2025

Dear Members of the New York State Department of Labor – Apprenticeship Training Council,

The Center for Economic Growth (CEG), is writing to express support for the proposed Wind Turbine Technician apprenticeship trade. As the Capital Region’s economic development organization, CEG can attest to the current and future demands for highly skilled workers who are knowledgeable in clean energy operations and service technologies.

New York State saw the introduction of the Climate Leadership and Community Protection Act (Climate Act) in 2019. The Climate Act requires that 70% of statewide electricity come from renewable energy sources by 2030¹. Offshore wind is proposed in the Climate Act as a source to meet New York State’s zero-emission electricity systems goals.

The inclusion of a structured apprenticeship program focused on wind energy operations and maintenance is essential to meeting the needs of existing and prospecting business in New York State. The industry is seeing a sharp increase in the international safety standards and regulations and there is a critical shortage of qualified individuals who can service, operate, and troubleshoot these complex systems. By developing a dedicated pathway for apprentices to acquire hands-on experience and formal training, this program will help to close the skills gap and provide workers with meaningful, well-paying career opportunities.

The proposed trade for Wind Turbine Technician strikes an ideal balance of rigorous training and practical on-the-job experience, enabling apprentices to gain the proficiency needed to enter the workforce quickly while ensuring that employers receive skilled individuals capable of meeting immediate needs. Furthermore, the apprenticeship's emphasis on industry-specific safety protocols, programming, calibration, and diagnostics will ensure that apprentices are equipped with the most relevant and up-to-date skill sets.

CEG supports the creation of the Wind Turbine Technician trade and encourages the New York State Department of Labor to move forward with its approval. We are confident that this program will have a lasting, positive impact on both employers and employees across New York State. Thank you for your time and consideration.

Sincerely,

Meredith O’Connell

¹ New York State Climate Action Council. 2022. “New York State Climate Action Council Scoping Plan.” climate.ny.gov/ScopingPlan



Manager, Workforce Development

Center for Economic Growth (CEG)

5 Computer Drive South | Albany, NY 12205

518.431.1486 | mereditho@ceg.org | ceg.org





March 8, 2025

VIA ELECTRONIC FILING

New York State Apprenticeship Council
ATCO@labor.ny.gov

Re: Comments on New Trade: Wind Turbine Technician

To the New York State Apprenticeship Council,

Thank you for considering the proposed Wind Turbine Technician apprenticeship trade. During the 25-year operations and maintenance (O&M) of a wind farm, Ørsted directly and permanently employs offshore wind turbine service technicians to perform the daily critical upkeep of our offshore wind farms. Our European O&M teams have benefitted from using an apprenticeship model, and thus Ørsted supports the registration of an offshore wind turbine service technician apprenticeship in New York. A Registered Apprenticeship Program for this occupation will benefit both employers and workers in this sector by increasing wider transparency about the wind turbine service technician career pathway.

Ørsted is the global leader in offshore wind and has been operating offshore wind farms for more than 30 years. In 2024, Ørsted began O&M on South Fork Wind, New York's first offshore wind farm. After a wind farm is constructed and commissioned, it transitions to the O&M phase, when offshore wind turbine service technicians begin their work. As we prepare to hire entry-level offshore wind turbine service technicians for South Fork Wind and future projects in the coming years, we hope to use the Registered Apprenticeship model to provide rigorous training and enhance worker retention, while providing a baseline standard to other workers and organizations in New York.

As a matter of principle, Ørsted supports measures that increase workplace health, safety, productivity and transparency, including workers' freedom of association, and their right to join or form unions. Providing a Registered Apprenticeship Program for entry level workers is supportive of this overall approach that prioritizes working people's safety and well-being. The registration and sponsorship of a wind turbine technician apprenticeship program does not preclude, inhibit or otherwise interfere with the apprentices' or O&M workers' rights to choose to become part of a union. Ørsted has memorialized these beliefs in our Code of Conduct and Responsible Business Partners Program.¹ Ørsted has developed and maintained positive working relationships with labor organizations since our entry into the U.S. market in 2016 and through the construction phase of each of its U.S. offshore wind projects.

In addition to these factors, there are several key reasons Ørsted is in support of the occupation becoming a Registered Apprenticeship Program:

1. **Offshore Wind Turbine Service Technicians are needed for long-term offshore power generation work, making retention paramount.** Wind turbine service technicians are integral operations & maintenance employees providing day-to-day upkeep that maximizes turbine safety and performance. Power generation facilities, including offshore wind farms, naturally require skilled and experienced operations workers to ensure maximum safety and performance while the facility is producing power. As they maintain and service turbines throughout the entire lifespan of a

wind farm, Ørsted will need such technicians for at least 25 years of consistent employment. We recognize that registered apprenticeship offers a pathway to stable, long-term employment, and helps to enhance worker retention rates through transparent milestones for wage increases and competency.

2. **To date, there is no apprenticeship standard that would produce competent Offshore Wind Turbine Service Technicians.** There is currently no registered apprenticeship for offshore wind turbine service technicians in New York. Such a program would help New Yorkers with relatively few formal skills become technicians and, to the benefit of both employers and jobseekers, increase transparency about what is required for a worker to demonstrate competence as an offshore wind turbine technician. Other excellent Registered Apprenticeship Programs in New York offer a subset of what is required to train an aspiring technician. However, focused On-the-Job Training (OJT) and Related Training Instruction (RTI) are required to prepare a worker fully for the safety risks and core competencies required to be an effective offshore wind turbine service technician. Please refer to the Apprenticeship Outline² for the mix of electrical, mechanical and hydraulic maintenance work experiences and offshore safety trainings required to become a competent offshore wind turbine service technician.

By establishing this program, employers will have a standard with which to provide aspiring technicians with the essential OJT and RTI that existing apprenticeships fail to offer. The unique combination of electrical, mechanical, and hydraulic maintenance activities required for wind turbine service is not covered by other programs, making this apprenticeship crucial for preparing competent technicians.

3. **Offshore Wind Turbine Service Technicians require specific OJT experience working on offshore turbines.** Wind turbine service technicians require unique access to operational turbines for effective OJT, as they must work with specific, proprietary equipment. Most offshore wind O&M work takes place offshore in federal waters, at extreme heights and in confined spaces, all at a significant distance from onshore emergency medical services. These conditions create a unique set of safety considerations. Offshore wind turbine service technicians typically live offshore for up to 14 days at a time due to the remote location of offshore wind farms, where they live aboard a vessel while working consecutive days. Because of the specialization, safety risks and logistics associated with the work of an offshore wind turbine service technician, an effective apprenticeship training model requires all OJT and RTI to focus specifically on offshore wind turbine operations.

To provide context for the degree of specialization required for offshore wind turbine service technicians to effectively perform offshore O&M functions, consider the case of 13 experienced wind turbine service technicians that Ørsted hired to support South Fork Wind. These workers had five or more years of prior wind turbine service experience. However, their first 18 months of work were spent training under the direction of qualified expert offshore wind turbine service technicians and support staff in Europe. Following this intensive training, the American technicians are now considered qualified to work as supervisory and/or experienced technicians on our U.S. projects. This experience requirement underscores the necessity of a specialized apprenticeship to ensure that less-experienced technicians acquire the specific experience needed to perform their roles safely and competently. Registration of this apprenticeship program will ensure that workers without



extensive experience can access this highly specialized career path under qualified instructors and a safe, structured working environment.

Thank you for your consideration, and please do not hesitate to reach out with any questions.

Best regards,

Erik Antokal

Workforce Development Director
Ørsted Americas

Tel. +15518041809

erant@orsted.com

437 Madison Avenue, 19th floor
New York, NY 10022

1. Ørsted's Code of Conduct and Responsible Business Partners Program can be found online here:

<https://orsted.com/-/media/www/docs/corp/com/sustainability/codeofconduct/orsted-code-of-conduct-for-business-partners-october-2022-english.ashx?rev=fedf06f46609483b95d8a6de18f1296f&hash=92fe8c02e857ce0029cbe80c41580704>

2. The Apprenticeship Outline can be found online here: <https://dol.ny.gov/apprenticeship/apprenticeship-trades>