

The Independent Electrical Contractors of Texas (IEC) is the largest statewide association of electrical contractors in the state representing over 600 non-union contractors that employ more than 30,000 Texas electricians. IEC members provide construction, installation, service and repair work for residential, commercial and industrial customers.

Recommendation 1.1

IEC appreciates the opportunity to submit comments on the Texas Sunset Commission Staff Report for the Texas Department of Licensing and Regulation (TDLR). IEC strongly supports Recommendation 1.1 to continue TDLR for 12 years.

Recommendation 1.2

IEC opposes Recommendation 1.2 to remove advisory board meeting requirements from statute authorizing TDLR to call meetings as needed. One of the greatest strengths of TDLR as an occupational regulatory agency are the active advisory boards. As stated in the agency's 2021-2025 Strategic Plan, *advisory boards provide invaluable expertise and efficiency... allowing TDLR to fulfill its core responsibilities with a small and efficient workforce, hiring and retaining staff strategically rather than attempting to employ industry experts skilled in the 234 license types TDLR regulates*. Overseeing the safety of all Texans who rely on and utilize electricity on a daily basis, surely justifies the need for the experts from the industry to advise the agency at least twice a year as currently required in statute.

Recommendation 1.3

IEC is concerned about Recommendation 1.3 authorizing TDLR to create interdisciplinary advisory boards to coordinate expertise and input for similar industries. IEC does support the idea of an interdisciplinary advisory committee (e.g. electrical, air conditioning, plumbing) to discuss emergency response but we would not be supportive of merging advisory boards or reducing the number of Electrical Safety and Licensing Board meetings.

Recommendation 2.8

IEC does not have a position specifically on Recommendation 2.8 to eliminate the journeyman industrial electrician license. However, if the license is continued, IEC has concerns with the program as TDLR misinterpreted the intent of the statutory provision requiring a test. IEC worked with proponents of the legislation to assure adequate testing as is required for other journeyman electricians. Instead of requiring a substantive test developed by subject matter experts as is done for all other electrical licensees, TDLR is accepting a certification from a non-governmental third-party, the National Center for Construction Education & Research which is not authorized in statute.

Recommendation 6.2

IEC recognizes the importance of improving the agency's response to repeat violators, however, we do not want the department to overlook the fact that many repeat offenders in the electrical program are the unlicensed contractors and electricians who pose the greatest risk to the public and routinely ignore the TDLR's enforcement efforts. This is a broad directive affecting every program at TDLR and IEC suggests that unlicensed activity be a priority in how the TDLR develops this data driven prioritization process.

Recommendation 7.2

Before taking a position on Recommendation 7.2 authorizing TDLR to require disclosure of additional financial and controlling information of applicants for certain business licenses, the IEC would like clarification regarding which business licenses would be impacted and what additional information would be required.