



THE STATE  
of **ALASKA**  
GOVERNOR MIKE DUNLEAVY

**Department of Labor and  
Workforce Development**

LABOR STANDARDS AND SAFETY  
Mechanical Inspection

1251 Muldoon Road, Suite 113  
Anchorage, Alaska 99504  
Main: 907.269.4925  
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September 23, 2025

Bill Stamm  
Alaska Village Electric Cooperative  
4831 Eagle Street  
Anchorage, AK 99503  
bstamm@avec.org

Dear Mr. Stamm,

We have received your request for variance under Alaska Statute 18.62.10 to allow AVEC to perform electrical work subject to the NESC in isolated communities with populations under 2,500. After review we have Denied your request for variance.

This decision is based solely on the fact that we are not granted the authority to grant a variance on requirements set forth in statute.

We did verify through our legal team that we have read the statute correctly and that no authority is granted to our department to issue such a variance. The only way to alter the wording of this requirement is to have it put forth as a bill in the upcoming legislative session. AVEC clearly states on their website that Bethel is within their service area.

Should you have further questions please contact me at (907) 269-4931.

Sincerely,



Scott Damerow  
Chief of Mechanical Inspection

cc: Tanya Keith, Director  
Paul Knecht, State Electrical Inspector  
Electrical Waiver File





**August 13, 2025**

**State of Alaska**

Department of Labor & Workforce Development  
Labor Standards and Safety Division  
Mechanical Inspection Section  
1251 Muldoon Road, Ste. 113  
Anchorage, AK 99504

**Subject:** Attachment to Code Variance Request Form – Request for Variance from Certificate of Fitness Requirement

Dear Mechanical Inspection Section:

Alaska Village Electric Cooperative (AVEC) respectfully requests a variance from the Department's position that all AVEC employees performing electrical work subject to NESC have a Certificate of Fitness .

AVEC is a member-owned utility holding a Certificate of Public Convenience and Necessity (CPCN) to serve 58 geographically isolated rural communities across Alaska. Power in these communities is generated locally and distributed through isolated microgrids that are not interconnected with each other or with any other utility system.

The only one of AVEC's service locations that serves a city or municipality with a population greater than 2,500 is Bethel. AVEC added the electric utility serving Bethel to the Cooperative in 2014. The prior owner of the electric utility and AVEC have both required employees performing electrical work subject to the NESC in Bethel to have a Certificate of Fitness. AVEC has never required employees working in its 57 other communities to have a Certificate of Fitness.

It is our understanding that the Division is taking the position that AVEC's service to Bethel disqualifies AVEC from continuing to provide service in its 57 rural villages with employees who do not have Certificates of Fitness when they are performing NESC work. AVEC does not agree with that position but in an attempt to resolve this issue AVEC is seeking a variance that would allow AVEC to continue to operate as it always has under a variance.

The variance requested would excuse AVEC employees performing electrical work subject to the NESC in communities with fewer than 2,500 residents from being required to possess a Certificate of Fitness. AVEC employees performing electrical work subject to the NESC in Bethel would continue to be required to possess a Certificate of Fitness.

## Grounds for Variance

In support of this request, AVEC submits the following:

**1. Impracticability of Compliance:**

- These communities are physically isolated, not connected by road (except Minto) to any hub or to each other.
- Recruiting or dispatching Certificate of Fitness holders to these locations is frequently not feasible in a timely manner due to travel restrictions, weather delays, and lack of available workforce.
- Many of these communities do not have any resident linemen at all.

**2. Substantial Compliance through Alternative Means:**

- AVEC has implemented internal training programs and proven operational practices that meet or exceed safety requirements for the installation, operation, and maintenance of electrical distribution systems.
- All field employees receive safety training aligned with OSHA and NESC standards, and supervision is provided remotely and/or through periodic site visits.

**3. No Increase in Risk to Physical Safety:**

- AVEC promotes a de-energized linework policy for equipment normally energized at over 600V in communities with a population under 2,500 to minimize employee exposure to primary voltages.
- Employees are assigned tasks that are commensurate with their training, equipment and proficiency.
- The requested variance will not introduce additional safety risk but will instead ensure that necessary maintenance and restoration work can be conducted promptly and efficiently.

**4. Public Interest & Equity:**

- Denial of this variance would impose service delays, extended outages, and unnecessary cost burdens on communities already paying significantly more for electricity—often 200% to 600% more than urban Alaska customers. It defeats the public safety purpose of the Certificates of Fitness requirements to cause an even greater danger for remote villages from being unable to timely address outages and keep systems safe and reliable.

## Request

Accordingly, AVEC requests a variance from the Certificate of Fitness requirement for its employees performing electrical work subject to the NESC in isolated communities with populations under 2,500.

We believe this approach honors the intent of the law, ensures the continued safety of utility operations, and supports equitable access to reliable electricity for rural Alaskans.

Please contact me directly with any questions or to discuss this request in further detail.

Sincerely,



Bill Stamm  
President and CEO  
Alaska Village Electric Cooperative  
4831 Eagle Street, Anchorage, AK 99503  
Phone: (907) 565-5531 | Email: [bstamm@avec.org](mailto:bstamm@avec.org)