

Brock Darnell

As a licensed electrical contractor operating in New Mexico, I am writing to express my concerns and opposition to the proposed OSHA heat illness prevention rule currently under consideration. While the safety of workers is a priority I take seriously every day on the job, I believe this rule is impractical and unnecessarily burdensome for electrical contractors and other skilled trades.

The proposed regulations appear to apply a one-size-fits-all standard without accounting for the dynamic nature of our work. For example, requiring fixed rest breaks at specific temperature thresholds does not reflect how electrical crews operate in the field, where scheduling is based on equipment availability, coordination with other trades, time-sensitive inspections, and in some cases emergency response or disaster recovery.

Additionally, the rule does not account for the existing safety protocols already in place. Most contractors, including our business, already provide water, encourage breaks as needed, and educate our workers about heat stress. Mandating rigid schedules and conditions—regardless of the actual risk—adds compliance burdens without a clear gain in safety.

This rule could also increase costs, delay project timelines, and make it harder for contractors to meet public and private infrastructure demands. The added red tape may hit small contractors hardest, while doing little to address the real issue: encouraging smart, situationally-aware practices tailored to the specific job site and task.

If the state moves forward with this regulation, I urge NM OSHA to revise the proposal to better reflect the realities of skilled trades work. A flexible, education-based approach would do far more to keep workers safe than blanket mandates that are difficult to apply in the field.

Sincerely,
Brock Darnell
U.S. Electrical Corporation