DOCKETED	
Docket Number:	23-DECARB-03
Project Title:	2025 California Building Energy Action Plan
TN #:	268757
Document Title:	Construction Trades Workforce Initiative Comments - Optimizing Workforce Strategies to Accelerate Progress on Meeting Building Energy Goals
Description:	N/A
Filer:	System
Organization:	Construction Trades Workforce Initiative
Submitter Role:	Public
Submission Date:	2/21/2026 4:10:34 PM
Docketed Date:	2/23/2026

Comment Received From: Construction Trades Workforce Initiative
Submitted On: 2/21/2026
Docket Number: 23-DECARB-03

Optimizing Workforce Strategies to Accelerate Progress on Meeting Building Energy Goals

Additional submitted attachment is included below.

February 20, 2026

RE: 2025 California Building Energy Action Plan

Construction Trades Workforce Initiative (CTWI) appreciates the opportunity to provide comments on the California Energy Commission's (CEC) 2025 California Building Energy Action Plan. CTWI is the nonprofit partner of the Building Trades, working to ensure the long term sustainability of the construction industry by bridging the gap between union construction labor and key stakeholders. CTWI represents Alameda, Contra Costa, Napa-Solano Building & Construction Trades Councils.

Thank you for the opportunity to provide comments on the California Energy Commission's (CEC) 2025 California Building Energy Action Plan.

We strongly support California's ambitious building decarbonization goals. However, achieving these goals will require confronting a central constraint: the state faces a significant shortage of trained, skilled workers capable of performing complex building energy upgrades safely, efficiently, and at scale.

The most reliable pathway to building and sustaining a skilled workforce is a high-road public works model that combines requirements for Prevailing Wage, employer paid benefits and apprenticeship utilization. This combination works to improve the recruitment, training and retention of skilled workers.

Short-term training programs lasting two to three days cannot substitute for the approximately 1,100 hours of classroom instruction and 8,000 hours of supervised job experience required in state-approved apprenticeship programs for plumbing, HVAC, and electrical crafts. If California is serious about quality installations, safety, and long-term workforce capacity, policies must prioritize these comprehensive training pipelines.

One of the barriers to using high road standards for building decarbonization programs in California is that programs using ratepayer funds awarded by the CPUC are required to use a

faulty cost effectiveness metric called TRC that fails to account for the energy benefits of using skilled labor. This faulty metric discourages not just PLAs but any high road labor strategies.

For the record though, we would like to note that studies suggest that Project Labor Agreements (PLAs) do not increase overall project costs, as documented in the publication cited in the Action Plan *(Jones, Betony, Jason Karpman, Molly Chlebnikow, and Alexis Goggans. 2019. California Building Decarbonization: Workforce Needs and Recommendations. UCLA Luskin Center, https://innovation.luskin.ucla.edu/wpcontent/uploads/2019/11/California_Building_Decarbonization.pdf)*

Another issue we would like to clarify is that the best mitigation for the loss of high-road gas utility jobs is not retraining programs, but the creation of new high-road jobs that utilize workers' skills that those workers have spent years developing. Work that would be appropriate for workers with skills associated with building and maintaining gas infrastructure include:

- Deployment of Thermal Energy Networks
- Installation of recycled water "purple pipe" infrastructure

Ensuring these projects get the emphasis that they deserve will contribute both to California's efforts to meet its climate goals (mitigation and resiliency) and to maintaining the economic wellbeing of gas workers and the unions that represent them. This kind of win win solution is the best kind of solution for just transition challenges.

Below we have provided some suggested revisions to the text of the draft to address these issues:

Suggested Amendments to Plan Language

Additions are underlined. Suggested deletions are struck through.

1. The TECH program provides consumer, contractor, and vendor training. ~~to help meet the local need for a skilled and trained workforce~~

2. Existing Activities to Build Workforces For years, many institutions and entities throughout California have administered programs to train and employ workers in emerging fields related to clean energy, electrification, and building decarbonization. These programs include multiyear apprenticeships, community college programs for career entry, and short-term certification-preparation courses for unemployed or underemployed workers. Multi-year joint labor management apprenticeship and continuing education programs provide the best support for a career in decarbonization trades. Short-term training programs can also help by teaching underemployed construction workers new skills and helping them obtain certification for HVAC retrofits and installing other equipment needed to meet California's decarbonization goals. 201

3. Opportunities for Workforce Development The most reliable pathway to building and sustaining a skilled workforce is a high-road public works model that combines requirements for Prevailing Wage, employer paid benefits and apprenticeship utilization. This combination works to improve the recruitment, training and retention of skilled workers. California is pursuing several building decarbonization programs that create opportunities to develop the decarbonization workforce. Four notable programs are the Building Initiative for Low-Emissions Development (BUILD) Program, the TECH program, the EBD Direct Install Program, and the TREC program. The TECH program provides consumer, ~~contractor,~~ and vendor as well as a shortform remedial training for contractors. ~~to help meet the local need for a skilled and trained workforce~~. The EBD Direct Install Program carries public works style requirements and also requires program administrators to "propose, implement, and measure results of a workforce plan with the goal of ensuring high-quality installations and creating local, high-quality jobs in the communities served."207 The EBD program also requires administrators to provide preference for contractors that source workers from local areas.208 California received a $10 million allocation to administer the TREC program, which will provide training and education to support contractors installing residential electrification improvements. The workforce training will help support the HOMES, HEEHRA, and the EBD Direct Install Program.209 The 2019 Energy Action Plan recommended developing a statewide plan for the future of the gas system that protects workers, communities, and ratepayers. As the electric utility sector grows, the gas infrastructure and delivery workforce may decline by a similar amount, as shown in Table 13. The best mitigation for the loss of high-road gas utility jobs is the creation of new high-road jobs that utilize skills that those workers have already spent years developing. Work that would be appropriate for workers with skills associated with building and maintaining gas infrastructure

include deployment of Thermal Energy Networks, construction and operations of utility scale geothermal generation projects, and installation of recycled water “purple pipe” infrastructure.

Ensuring these projects get the emphasis that they deserve will contribute both to California's efforts to meet its climate goals (mitigation and resiliency) and to maintaining the economic wellbeing of gas workers and the unions that represent them. This kind of win win solution is the best kind of solution for just transition challenges. ~~Retraining workers from gas utilities, and contractors who specialize in gas equipment, may be one way to provide a pipeline of new but experienced workers who can conduct decarbonization retrofits.~~

4. Barriers •

There is a shortage of skilled workers ~~in the workforce~~ needed to install decarbonization retrofits to meet California’s 2045 decarbonization goals. •

Many Decarbonization programs ~~may be less cost-effective if contracts with~~ lack high-road jobs requirements needed to improve the recruitment, training and retention of skilled workers necessary to remediate the current shortage. ~~, such as union labor or prevailing wage jobs, are part of program requirements.~~

Programs funded by the CPUC tend to lack such requirements principally because the TRC cost effectiveness metric used by the CPUC fails to account for the significant energy and other benefits generated by high road job requirements. Reforming this faulty metric could unlock better program performance in terms of quality workmanship and the contribution towards building a robust skilled workforce.

We appreciate your consideration of the above suggestions

Respectfully,

Beli Acharya, Executive Director

Construction Trades Workforce Initiative