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Advancing the Equitable Building Decarbonization Program

The Sheet Metal Workers Local Union No. 104 appreciates the California Energy Commission's continued efforts to advance the goals of the Equitable Building Decarbonization Program, particularly with respect to equity, workforce quality, energy efficiency, and long-term community benefit. As implementation of the program continues statewide, SMART Local 104 believes there is a significant opportunity to strengthen program consistency, accountability, and contractor participation through clearer and more objective workforce and procurement standards.

At present, several workforce-related concepts used throughout program implementation and procurement appear to lack sufficiently defined or verifiable standards. Terms such as "trained and qualified workforce," while directionally aligned with the Commission's stated policy goals, do not currently appear to have clear administrative or statutory definitions capable of consistent statewide application. In practice, this creates uncertainty for regional administrators, contractors, workforce stakeholders, and community partners alike.

SMART Local 104 respectfully recommends that future RFQs, program guidelines, and administrative materials incorporate more objective and verifiable workforce qualification standards. One possible pathway would be to recognize employers affiliated with Division of Apprenticeship Standards-approved apprenticeship programs as satisfying baseline workforce training and qualification criteria. Establishing objective standards tied to existing state-recognized training infrastructure would improve consistency while reducing administrative ambiguity.

Similarly, equity and targeted workforce participation goals would benefit from clearer measurable benchmarks and verification pathways. Current procurement structures often rely heavily on contractor narratives or generalized commitments without corresponding documentation or measurable thresholds. Establishing more objective reporting or verification mechanisms would improve accountability while also ensuring that the program's equity goals are translated into measurable outcomes.

SMART Local 104 also believes greater consistency among regional administrators would improve contractor predictability and strengthen confidence in program participation. Uniform guidance concerning workforce standards, verification procedures, and procurement expectations would help reduce uncertainty while supporting the Commission's broader policy objectives.

These recommendations are offered in support of the long-term success of the Equitable Building Decarbonization Program and with appreciation for the Commission's ongoing engagement with workforce and community stakeholders. SMART Local 104 welcomes continued discussion regarding practical implementation pathways that improve accountability, consistency, workforce quality, and equitable program delivery.