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25-EPIC-01_SMART Local 104 Comments on EPIC 5_260611

Additional submitted attachment is included below.



California Energy Commission

Docket No. 25-EPIC-01

RE: Comments on Electric Program Investment Charge 2026–2030 Investment Plan (EPIC 5)

Submitted by:

Christopher Ruch
Codes & Standards Representative
SMART, Sheet Metal Workers' Local Union No. 104
4040 Lennane Drive, Sacramento, CA 95834
(916) 280-6281
chrisr@smw104.org

Date: June 11, 2026

Dear Commissioners,

Thank you for the opportunity to provide comments on Electric Program Investment Charge 2026–2030 Investment Plan (EPIC 5)

[SMART Local 104](#) represents more than 9,000 highly skilled sheet metal workers, HVAC technicians, and Testing, Adjusting, and Balancing (TAB) professionals across 49 California counties, from the Oregon border to Ventura County. Through state-approved apprenticeship programs and labor-management training partnerships, Local 104 develops a highly trained workforce that designs, fabricates, installs, commissions, and maintains the mechanical systems that support California's buildings, infrastructure, and clean energy transition.

Local 104 supports workforce policies that create family-supporting careers, expand apprenticeship opportunities, strengthen local communities, and ensure public investments deliver both environmental and economic benefits for California workers.

SMART Local 104 appreciates the California Energy Commission's continued commitment to workforce development, job creation, economic opportunity, and equitable participation in California's clean energy transition. The [EPIC 4](#) Investment Plan appropriately recognized that public investments should support workforce development pathways and create economic opportunities for California workers and communities.



As the Commission develops the [EPIC 5](#) Investment Plan, we encourage the Commission to build upon this foundation by incorporating stronger workforce standards, workforce accountability measures, and High-Road workforce principles throughout program design, evaluation criteria, and performance metrics.

Recent discussions at the [2026 CEC/EPRI Electrification Summit](#) reinforced the importance of workforce quality to the successful deployment of electrification and decarbonization technologies. Stakeholders repeatedly emphasized that achieving California's ambitious climate and energy goals will require not only innovative technologies, but also a highly skilled workforce capable of installing, commissioning, operating, and maintaining those technologies effectively.

The Commission should also consider the lessons learned from the [TECH Clean California Workforce, Education, and Training Evaluation of the ESMAC training requirement](#). That evaluation found that introductory awareness training can provide valuable market education but does not provide the hands-on instruction, competency verification, technical assessment, or applied learning necessary to develop installer-level proficiency. The evaluation highlighted the importance of rigorous workforce development pathways, including state-approved apprenticeship programs and advanced technical training, to ensure workforce competency and successful project outcomes.

As EPIC investments increasingly target disadvantaged communities, workforce considerations should remain central to the Commission's equity objectives. Decarbonization strategies should not focus solely on the deployment of clean energy technologies within disadvantaged communities. Real systemic change for disadvantaged communities will not come from simply providing electric appliances or promoting short-term online training programs. It will come from advancing skilled labor standards, career-building apprenticeship programs, and workforce requirements that create meaningful access to high-quality jobs within all stages of these publicly funded programs.

True equitable participation also requires addressing persistent economic challenges, including low wages, limited career advancement opportunities, and jobs that often lack family-supporting wages and benefits. Public investments should help create pathways into high-quality careers that provide long-term economic mobility and allow workers and families in disadvantaged communities to fully participate in and benefit from California's clean energy transition.

Workforce Quality and Implementation Requirements for EPIC-Funded Activities

Accordingly, SMART Local 104 recommends that EPIC 5 explicitly incorporate High-Road workforce principles, including:

Work Performed Under EPIC-Funded Projects



- All work associated with EPIC-funded projects should be performed by a Skilled and Trained Workforce consistent with California's workforce development objectives. This requirement should apply to all phases of project construction, installation, commissioning, testing, and maintenance, including work performed on modular, prefabricated, or factory-assembled systems and equipment.

Integration of Workforce Standards into EPIC 5 Program Design and Implementation

- All EPIC-funded research, development, demonstration, and deployment activities should include a workforce implementation plan that supports California's long-term workforce, economic development, and equity objectives. Such plans should identify how projects will:
 - Promote workforce retention and career advancement opportunities;
 - Utilize state-approved apprenticeship programs where applicable;
 - Establish partnerships with labor-management training programs, community colleges, workforce development boards, and other workforce development intermediaries;
 - Expand access to quality career pathways for disadvantaged workers, women, veterans, justice-involved individuals, and other underrepresented populations; and
 - Support ongoing workforce education, upskilling, and skill development aligned with emerging clean energy technologies.

Workforce implementation plans should be incorporated into project design, evaluation criteria, and performance metrics to ensure that public investments advance not only technology innovation, but also workforce development, economic mobility, and long-term workforce capacity throughout California's clean energy economy. .

By incorporating these principles, EPIC 5 can strengthen workforce capacity, improve technology performance, protect public investments, and maximize both the economic and environmental benefits generated through California's clean energy programs.

SMART Local 104 appreciates the opportunity to provide these comments and looks forward to continued engagement with the Commission as EPIC 5 is developed.

A handwritten signature in black ink, appearing to read "Christopher Ruch".

Christopher Ruch
Codes & Standards Representative
SMART, Sheet Metal Workers' Local Union No. 104

