

DOCKETED	
Docket Number:	26-IEPR-05
Project Title:	Energy Equity and Environmental Justice
TN #:	271275
Document Title:	Joseph F Sullivan Comments - Strengthening Labor Compliance and Workforce Standards
Description:	N/A
Filer:	System
Organization:	Joseph F Sullivan
Submitter Role:	Public
Submission Date:	7/6/2026 11:47:36 AM
Docketed Date:	7/6/2026

Comment Received From: Joseph F Sullivan
Submitted On: 7/6/2026
Docket Number: 26-IEPR-05

Strengthening Labor Compliance and Workforce Standards

Please find attached comments submitted on behalf of IBEW Local 11 and the Los Angeles Chapter of the National Electrical Contractors Association (LA NECA) regarding labor compliance and workforce standards in the 2026 Integrated Energy Policy Report. Thank you for your consideration.

Additional submitted attachment is included below.



July 6, 2026

California Energy Commission

Re: 2026 Integrated Energy Policy Report (Docket No. 26-IEPR-05). – Labor Compliance and Workforce Standards

Dear Commissioners:

On behalf of IBEW Local 11 and the Los Angeles Chapter of the National Electrical Contractors Association (LA NECA), we appreciate the opportunity to provide comments on the 2026 Integrated Energy Policy Report.

Our organizations represent the skilled electricians and union electrical contractors who build California's clean energy infrastructure. Through one of the nation's largest electrical apprenticeship and training programs, we prepare thousands of workers for careers in electric infrastructure, building electrification, energy storage, electric vehicle charging infrastructure, renewable energy, and other emerging clean energy technologies. We also work closely with community-based organizations, workforce development partners, educational institutions, and public agencies to recruit and train a diverse workforce that reflects the communities we serve.

We commend the California Energy Commission for incorporating meaningful workforce standards into programs such as the Equitable Building Decarbonization Program. Those efforts recognize that public investments can advance California's climate goals while also creating pathways into family-sustaining, middle-class careers.

As the Commission develops future funding opportunities, we encourage it to build on this foundation by adopting stronger and more consistent labor compliance and workforce standards across its programs. California and the federal government have increasingly incorporated high-road workforce standards into clean energy investments, including prevailing wage, apprenticeship utilization, Skilled and Trained Workforce requirements, and Electric Vehicle Infrastructure Training Program (EVITP) certification where appropriate. Aligning future CEC funding opportunities with these established workforce expectations will provide greater consistency for applicants, improve compliance, and help ensure public investments deliver both high-quality infrastructure and high-quality careers. Specifically, we encourage the Commission to:

- Continue expanding the use of prevailing wage, state-approved apprenticeship, Skilled and Trained Workforce requirements, EVITP certification where applicable, and other proven high-road workforce standards that promote safety, quality, and workforce development.
- Develop standardized solicitation language that clearly communicates applicants' labor compliance responsibilities and workforce requirements across CEC funding programs.
- Provide prevailing wage and labor compliance training for CEC program staff, grant administrators, and funding recipients to improve understanding and implementation of these requirements.
- Recognize labor compliance as a critical program function and allow grant recipients and third-party administrators to budget appropriately for compliance activities.

California's clean energy investments should not only reduce emissions but also strengthen the state's skilled workforce, create lasting economic opportunity, and ensure taxpayer dollars support projects built safely, efficiently, and to the highest standards of quality. Consistent labor compliance requirements and workforce standards are essential to achieving these objectives, and we appreciate the Commission's continued leadership in this area.

Thank you for your consideration. We welcome the opportunity to work with the Commission as it continues to strengthen workforce policies and implement California's clean energy goals.

Sincerely,

Joe Sullivan

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