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*Comment Received From: David Phillips Vincent*  
*Submitted On: 7/9/2026*  
*Docket Number: 26-IEPR-05*

**2026 Integrated Energy Policy Report Update, Docket No 26-IEPR-05 Labor Compliance and Workforce Standards**

*Additional submitted attachment is included below.*



July 8, 2026

California Energy Commission  
Docket Unit  
715 P Street  
Sacramento, CA 95814

**Re: 2026 Integrated Energy Policy Report Update, Docket No. 26-IEPR-05  
Labor Compliance and Workforce Standards**

**Submitted by:**

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Dear Commissioners:

On behalf of the Western States Council of Sheet Metal Workers, we appreciate the opportunity to provide comments on the 2026 Integrated Energy Policy Report Update, Docket No. 26-IEPR-05, with respect to labor compliance, workforce standards, energy equity, and environmental justice.

The Western States Council of Sheet Metal Workers represents Sheet Metal Workers throughout California, Arizona, Nevada, and Hawaii, including the members of SMART Local Unions 104, 105, and 206 in California. Together, these three California Locals represent over 25,000 members across all 58 counties of the state. Our members are highly trained workers who perform the skilled sheet metal, HVAC, ventilation, indoor air quality, energy efficiency, building decarbonization, and related work necessary to deliver California's clean energy transition safely, efficiently, and equitably.

Our members are on the front lines of California's climate and energy goals. They install, service, maintain, and retrofit the mechanical systems that make buildings healthier, more efficient, and more resilient. Through state approved apprenticeship and advanced journey level training programs, our workforce is prepared to deliver high quality, code compliant work that protects

public safety, improves energy performance, and supports family sustaining careers in communities throughout California.

We commend the California Energy Commission for its continued leadership in advancing clean energy, building decarbonization, transportation electrification, energy equity, and environmental justice. We also appreciate the Commission's recognition that public investment should do more than reduce emissions. They should create high quality careers, support responsible contractors, expand access to skilled training, and deliver lasting benefits to the communities most impacted by pollution, disinvestment, and climate change.

For these goals to be fully realized, labor compliance and workforce standards must be treated as central program functions, not secondary administrative issues. **As the CEC continues to fund and administer programs involving construction, installation, retrofit, maintenance, and related skilled trades work, the Commission should strengthen how labor standards are communicated, tracked, verified, and enforced across both existing and future programs.**

The Western States Council respectfully recommends that the Commission include in the 2026 IEPR a clear recommendation directing the CEC to develop a standardized labor compliance framework for all CEC funded programs involving construction, installation, retrofit, maintenance, or related skilled trades work. This framework should apply whether the work is administered directly by the CEC or indirectly through a grantee, regional administrator, local government, nonprofit entity, community-based organization, or other third-party program partner.

This is especially important where CEC funding is administered through entities that may have substantial expertise in energy, housing, climate, or community program delivery, but may not always have the experience or infrastructure necessary to administer California public works requirements, prevailing wage obligations, apprenticeship standards, Skilled and Trained Workforce requirements, certified payroll reporting, contractor responsibility review, or subcontractor disclosure requirements. **The CEC should not place regional administrators or program partners in the position of administering complex labor compliance obligations without clear rules, training, funding, and oversight.**

At a minimum, this framework should include clear labor compliance language in grant solicitations, funding agreements, program guidelines, and contracts. Applicants and funding recipients should be advised at the outset of any applicable prevailing wage, apprenticeship, Skilled and Trained Workforce, certified payroll, contractor registration, subcontractor disclosure, and contractor responsibility requirements. These obligations should be incorporated into binding agreements and carried through every tier of contracting.

**The CEC should also require timely public disclosure of basic project information for CEC funded construction and installation work.** The public should be able to identify the project location, anticipated schedule, awarding entity or administrator, prime contractor, listed subcontractors, scope of work, contract amount, applicable labor standards, compliance contact, and PWC-100 filing status before or near the start of work. When this information is unavailable

until after a project is complete, workers, labor organizations, enforcement agencies, and the public lose the ability to identify and address compliance problems in real time.

While we appreciate the CEC's willingness to consider ways to improve transparency, receiving contractor, subcontractor, schedule, cost, and location information only after completion limits the ability of workers, labor organizations, and enforcement agencies to monitor compliance while work is underway. It also makes it more difficult to determine whether required public works filings have been submitted, whether certified payroll records are being maintained, and whether prevailing wage, apprenticeship, and other labor standards are being followed.

This transparency is directly connected to the CEC's commitment to centering energy equity and environmental justice. Equity is not achieved only by directing clean energy investments into underserved communities. Equity also requires ensuring that those investments support lawful work, family sustaining careers, high quality training, responsible contractors, and enforceable worker protections. Communities should be able to see who is performing publicly funded work in their neighborhoods and whether those contractors are complying with the standards attached to public funding.

A clean energy program that lacks transparency or meaningful labor enforcement risks replicating the very inequities it is intended to address. If workers cannot determine where projects are taking place, if the public cannot identify who is performing the work, if responsible contractors are undercut by contractors that fail to comply with the law, and if labor violations are discovered only after public funds have been spent, then the program has not fully centered energy equity or environmental justice.

The State has seen similar challenges in other publicly funded programs. For example, the Department of Industrial Relations has publicly reminded Homekey employers that publicly funded Homekey construction projects may be subject to prevailing wage, workers' compensation, health and safety, and apprenticeship requirements. That experience illustrates the importance of building labor compliance into program design from the beginning, rather than relying on after the fact enforcement once violations have already occurred. The CEC has the opportunity to avoid similar problems by ensuring that its programs are transparent, traceable, and enforceable from the start.

**The CEC should also establish a contractor responsibility review process for CEC-funded work.** Public clean energy investments should not be awarded to contractors with serious or repeated histories of wage theft, apprenticeship violations, Skilled and Trained Workforce noncompliance, license violations, payroll fraud, or other conduct that calls into question their ability to responsibly perform publicly funded work. Standardized procurement and solicitation procedures would help ensure that responsible contractors are not undercut by contractors that fail to comply with the law.

This is particularly important when procurement decisions are made by affiliated nonpublic entities, regional administrators, or other third-party program partners. **The CEC should ensure**

**that these entities apply clear and consistent responsibility standards before awarding publicly funded work.** Those standards should include review of contractor licensing, public works registration, debarment status, prior labor law violations, apprenticeship compliance history, and any other relevant information bearing on whether a contractor is capable of performing publicly funded work responsibly.

**The CEC should treat labor compliance as program critical work and allow funding recipients, regional administrators, and third-party administrators to budget appropriately for compliance activities.** Compliance requires staff time, training, documentation, payroll review, contractor communication, complaint intake, and coordination with enforcement agencies. If the CEC expects its program partners to administer labor standards, those responsibilities should be recognized, funded, trained, and monitored as part of program delivery.

**The CEC should also provide labor compliance training for its own staff, grant managers, regional administrators, third party administrators, and funding recipients.** Training should cover prevailing wage, apprenticeship, Skilled and Trained Workforce requirements, certified payroll reporting, public works registration, contractor responsibility, subcontractor disclosure, and procedures for referring potential violations to DIR, DLSE, DAS, CSLB, or other appropriate agencies. Standardized training and model materials would improve consistency across programs and reduce confusion for applicants, administrators, and contractors.

**The CEC should establish meaningful enforcement mechanisms.** Compliance should not depend solely on contractor self-certification or voluntary correction after violations are found. Program rules should authorize the CEC or its administrators to require corrective action, withhold funds, deny reimbursement, require repayment, terminate participation, disqualify noncompliant contractors or grantees from future funding, and refer violations to appropriate enforcement agencies. Without meaningful consequences, labor standards become “optional” rather than enforceable.

**The CEC should also ensure that public works projects are traceable through existing state systems.** Where CEC funded work is a public work, the appropriate awarding body, grantee, regional administrator, or program partner should be required to file a PWC-100 with DIR before work begins. **The CEC should not rely on assumption or informal expectation that third party administrators will make these filings.** Program rules should require proof of filing where applicable, and failure to ensure required filings should have consequences under the applicable grant or funding agreement.

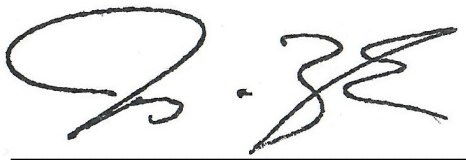
**Finally, the CEC should ground workforce standards in objective, verifiable criteria.** Terms such as “trained and qualified workforce” should be tied to recognized California training infrastructure, including state approved apprenticeship programs, documented journey level training, applicable Skilled and Trained Workforce requirements, and other measurable standards. Similarly, equity and workforce participation goals should be supported by documentation, reporting, and verification rather than narrative commitments alone.

These recommendations are intended to strengthen the CEC's clean energy mission. Clear rules, timely transparency, responsible contractor standards, and meaningful labor compliance will help projects move forward with greater confidence, reduce uncertainty for applicants and administrators, protect workers, support high road contractors, and ensure that public investments produce durable benefits for California communities.

California's energy transition must be built to last. That means it must be built safely, lawfully, and transparently, and by a skilled workforce capable of delivering the quality, efficiency, and accountability that the public deserves. The Western States Council of Sheet Metal Workers welcomes the opportunity to work with the Commission, its staff, and its program partners to help develop practical labor compliance procedures that support energy equity, environmental justice, responsible procurement, and high-quality clean energy jobs throughout California.

Thank you for your consideration.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "J. Zeedyk", written over a horizontal line.

**Jeremy Zeedyk**, Grant Administrator & Special Projects Coordinator

**Western States Council of the International Association of Sheet Metal, Air, Rail, and Transportation Workers**

A handwritten signature in blue ink, appearing to read "David Vincent", written over a horizontal line.

**David Vincent**, Compliance Representative

**SMART, Sheet Metal Workers' Local Union No. 104**