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2026 Integrated Energy Policy Report Update, Docket No. 26-IEPR-05

Additional submitted attachment is included below.

State Building and Construction Trades Council of California

CHRIS HANNAN
PRESIDENT

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BUILDING AND CONSTRUCTION TRADES
DEPARTMENT
AFL - CIO

J. TOM BACA
SECRETARY-TREASURER

July 10, 2026

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

Re: 2026 Integrated Energy Policy Report Update, Docket No. 26-IEPR-05

Dear Commissioners:

On behalf of the State Building and Construction Trades Council of California (SBCTC), representing over 450,000 working women and men in the construction industry, including over 65,000 enrolled in our state-of-the-art apprenticeship programs around the state, I appreciate the opportunity to comment on the 2026 Integrated Energy Policy Report Update.

California is making significant public investments to modernize buildings, reduce emissions, expand clean energy infrastructure, improve efficiency, and advance energy equity. These investments will require substantial construction and installation work across the state. As the California Energy Commission (CEC) continues to design, fund, and oversee these programs, the SBCTC urges the Commission to ensure that public dollars are tied to clear accountability measures for the contractors and entities performing the work.

The SBCTC represents skilled construction workers throughout California. Our members are trained through joint-labor management-run, state-approved apprenticeship programs and perform the work that turns energy policy into actual projects. Whether the work involves building systems, electrification, energy upgrades, mechanical systems, transportation infrastructure, or related construction, the success of these programs depends on the quality and reliability of the workforce delivering them.

Strong labor standards are not separate from California's climate goals. They are one of the ways the state ensures that public investments produce durable public benefits. Prevailing wage laws, apprenticeship requirements, Skilled and Trained Workforce standards, contractor registration, and certified payroll requirements help protect workers, support responsible contractors, and maintain the trained workforce California needs to meet its long-term energy goals.

For that reason, the SBCTC encourages the CEC to review its funded programs to ensure that labor standards are clearly assigned, understood, and capable of being verified before work begins. CEC dollars are often distributed through multiple layers of program administrators, grant recipients, local agencies, nonprofit partners, consultants, and contractors. Without clear direction from the Commission, this structure can make it difficult to determine who is responsible for confirming compliance with public works obligations.

The SBCTC recommends that CEC program documents more clearly identify when construction-related work may trigger state labor requirements and what steps recipients must take to comply. This should include clear expectations regarding wage compliance, apprenticeship participation, use of qualified labor, contractor registration, payroll documentation, subcontractor reporting, and any applicable skilled and trained workforce obligations as defined at Public Contract Code Section 2600.

The CEC should also improve visibility into publicly funded construction work while projects are still active. For compliance to be meaningful, workers, the public, enforcement agencies, and interested stakeholders need timely access to basic information about the work being performed, including project locations, responsible administrators, prime contractors, subcontractors, scopes of work, applicable labor requirements, and appropriate compliance contacts. When that information is unavailable until after work is completed, the opportunity to prevent violations or correct problems in real time is often lost.

This issue is especially important because clean energy investments are often intended to benefit communities that have historically experienced pollution, disinvestment, and economic inequality. Those communities should receive not only cleaner, more efficient infrastructure but also the protections that come with lawful work, skilled training pathways, and responsible contracting. Energy equity should include both environmental and job-quality outcomes.

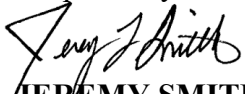
The SBCTC also urges the CEC to ensure that public funds are not awarded to contractors or subcontractors with serious records of wage theft, payroll fraud, apprenticeship violations, licensing problems, debarment, or other conduct showing an inability to responsibly perform publicly funded work. A basic responsibility review would help protect public funds, support law-abiding contractors, and reduce the risk that CEC-funded programs become vulnerable to abuse.

In addition, the CEC should provide practical guidance to its staff, grantees, and program administrators on identifying and administering labor obligations. That guidance should address when a public works filing is required, how contractor and subcontractor information should be tracked, how payroll documentation should be handled, and when concerns should be referred to the appropriate state enforcement agency. Program partners asked to perform these functions should be allowed to budget for the staff time and administrative resources necessary to do so.

Finally, the SBCTC encourages the CEC to use measurable workforce standards wherever possible. General references to a “trained,” “qualified,” or “skilled” workforce are most effective when tied to objective criteria, such as state-approved apprenticeship and journey-worker training, documented experience, or applicable skilled and trained workforce requirements.

California’s clean energy transition should be built by a workforce that is properly trained, fairly paid, and protected by the standards the state has already adopted. By strengthening accountability in its funded programs, the CEC can help ensure that clean energy investments support responsible contractors, protect workers, strengthen apprenticeship, and deliver lasting benefits to California communities. We respectfully request that the CEC adopt clear labor and accountability standards for its funded programs and apply them consistently to guide implementation and enforcement.

Respectfully,


JEREMY SMITH
Chief of Staff