

DOCKETED	
Docket Number:	26-IEPR-05
Project Title:	Energy Equity and Environmental Justice
TN #:	271429
Document Title:	CCA Workforce & Environmental Justice Alliance Comments on IEPR Energy Equity and Environmental Justice
Description:	Recommends practical steps for incorporating workforce and labor compliance into the CEC's energy equity and environmental justice work, including clear labor standards, workforce reporting, responsible contractor review, timely project disclosure, and compliance support for CEC-funded programs administered through CCAs, RENs, local governments, community-based organizations, and other third-party partners.
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Submission Date:	7/14/2026 1:56:28 PM
Docketed Date:	7/14/2026



July 14, 2026

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

Re: 2026 Integrated Energy Policy Report Update, Docket No. 26-IEPR-05 — Energy Equity and Environmental Justice

Dear Commissioners:

The CCA Workforce & Environmental Justice Alliance appreciates the opportunity to comment on the 2026 Integrated Energy Policy Report Update, Docket No. 26-IEPR-05, regarding Energy Equity and Environmental Justice. The Alliance brings together **labor, environmental justice, environmental, and community perspectives** to support clean-energy implementation that is **affordable, equitable, environmentally meaningful, and grounded in high-road workforce standards**.

We submit these comments to reinforce that **energy equity should recognize communities both as energy customers and as workers**. Communities of color and disadvantaged communities are not only affected by energy affordability, reliability, pollution, and program access; they are also part of the workforce that builds, installs, maintains, and operates the clean-energy transition. An equity framework that focuses only on consumers risks missing whether public clean-energy investments are also creating family-sustaining jobs, apprenticeship pathways, responsible contractor participation, and enforceable labor standards. **A stronger IEPR equity framework should integrate both consumer and worker outcomes.**

We have reviewed and support the labor-compliance recommendations submitted by IBEW Local 11 / LA NECA and the Western States Council of Sheet Metal Workers / SMART Local 104 in this docket. Those comments appropriately emphasize that workforce standards are only meaningful when they are **clear, consistent, funded, transparent, and enforceable**. The Alliance submits these comments to reinforce that core message and to add our perspective on how these principles should be integrated into **CEC-funded clean-energy programs**, including programs administered through **CCAs, RENs, local governments, community-based organizations, and other third-party partners**.

1. Build labor compliance into clean-energy program design from the start.

The CEC should develop a standardized labor compliance framework for CEC-funded programs involving construction, installation, retrofit, maintenance, and related skilled-trades work. That framework should apply whether the program is administered directly by CEC or through grantees, regional administrators, local governments, CCAs, RENs, community-based organizations, or other third-party partners. Many of these entities bring important energy, housing, climate, or community expertise, but may not have the internal capacity to manage California public works requirements without clear rules, training, funding, and oversight. **Labor compliance should therefore be treated as a core program function, not an after-the-fact administrative burden.**

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 understand at the outset which prevailing wage, apprenticeship, Skilled and Trained Workforce, certified payroll, contractor registration, subcontractor disclosure, contractor responsibility, and trade-specific certification requirements apply. Those obligations should be incorporated into **binding agreements and carried through every tier of contracting.** Where appropriate, CEC-funded work should also support recognized certifications such as EVITP, ESAMTAC, CALCPT, and other applicable trade-specific standards for clean-energy, storage, microgrid, HVAC, and building decarbonization work.

The CEC should also provide labor compliance training for its own staff, grant managers, regional administrators, third-party administrators, grantees, contractors, and funding recipients. Compliance requires staff time, documentation, payroll review, contractor communication, complaint intake, and coordination with enforcement agencies. If CEC expects program partners to administer labor standards, those responsibilities should be **recognized, funded, trained, and monitored as part of program delivery.** Program rules should also include meaningful enforcement mechanisms, including corrective action, withholding or denying reimbursement where appropriate, repayment, disqualification from future funding, and referral to DIR, DLSE, DAS, CSLB, or other appropriate agencies when violations are identified.

The CEC should also require timely transparency for CEC-funded construction and installation work so **labor compliance can happen while projects are underway, not only after violations are identified or public funds have been spent.** Program materials should identify the project location, schedule, awarding entity, prime contractor, listed subcontractors, scope of work, applicable labor standards, compliance contact, and PWC-100 filing status where applicable. CEC should also require contractor responsibility review so public clean-energy funds do not support contractors with serious or repeated histories of wage theft, apprenticeship violations, licensing violations, payroll fraud, or similar misconduct.

2. Measure workforce outcomes as part of energy equity.

As the CEC continues developing its Energy Equity Indicators and related equity framework, **workforce outcomes should be incorporated alongside traditional consumer-focused measures.** Public investments should be evaluated not only by whether they reduce energy burdens or expand access to clean-energy programs, but also by whether they create high-quality jobs, expand apprenticeship opportunities, support responsible contractors, and produce lasting economic benefits in disadvantaged communities. **Measuring both consumer and worker outcomes** will provide a more complete picture of whether California's clean-energy investments are achieving equitable results.

3. Apply labor and workforce standards across CCA, REN, and local-government implementation.

The CEC should ensure that equity and workforce standards are built into clean-energy programs administered through CCAs, RENs, local governments, community-based organizations, and other third-party partners. These entities are often central to delivering DER, building decarbonization, storage, EV infrastructure, resilience, and local clean-energy programs, but their labor compliance capacity can vary widely. CEC guidance, funding agreements, and program design should make clear that **public clean-energy dollars must support both community benefits and high-road workforce outcomes.** Because the IEPR also informs broader state energy planning, the CEC should encourage similar expectations in **CPUC-funded or CPUC-influenced programs where appropriate.**

4. Build internal labor and workforce capacity across CEC programs.

To implement these recommendations consistently, CEC should continue building internal labor and workforce expertise across relevant divisions. A single workforce advisor can help move this work forward, but **labor standards, apprenticeship pathways, compliance expectations, and workforce metrics need to be integrated early** in program design, solicitation development, grant administration, and evaluation. CEC should consider a **labor/workforce liaison structure across divisions**, similar in concept to the way CEC has embedded tribal liaison capacity, so workforce issues are not added late or treated as optional implementation details.

These recommendations are intended to strengthen the CEC's energy equity work and help ensure that clean-energy investments deliver durable public benefits.

Clear labor standards, funded compliance capacity, workforce metrics, and stronger implementation support will help programs reduce emissions, improve affordability and resilience, protect workers, support responsible contractors, and create high-quality career pathways in the communities most affected by pollution, disinvestment, and climate change. The Alliance appreciates the Commission's leadership and welcomes the opportunity to support practical implementation of these goals.

Respectfully submitted,

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