

## POLITICO GROUP

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October 24, 2013

Delivered Via Email

California Energy Commission  
Dockets Office, MS-4  
1516 Ninth Street  
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**RE: Comments of the California Chapters of the National Electrical Contractors Association (NECA) on the Proposition 39: California Clean Energy Job Act – 2013 Program Implementation Draft Guidelines (Docket No. 13-CCEJA-1)**

Dear Commissioners and Staff:

On behalf of the California Chapters of the National Electrical Contractors Association (NECA), we offer the following comments on the Proposition 39: California Clean Energy Job Act – 2013 Program Implementation Draft Guidelines, in support of successful program implementation and to ensure the best possible data on jobs and workforce outcomes from Proposition 39 investments.

SB 73 directs the state to track and report job creation and training outcomes resulting from Proposition 39 investments. This will provide critical data to measure progress toward the Proposition's goal to "create good-paying energy efficiency and clean energy jobs in California" and will help implementers evaluate program outcomes and improve program performance.

In order to ensure accountability, good quality jobs and workforce data we strongly urge you to require local education agencies (LEAs) to track and report metrics for job quantity and job quality, along with the demographic and geographic distribution of workers. At minimum, LEAs should require contractors to report data based on certified payroll records for each worker employed on a project that receives Proposition 39 funds, including:

- Job classification by trade, craft, and prevailing wage category;
- Job classification by journey level or apprentice level;
- Hourly rate of pay;
- Number of hours worked per week; and
- Zip code of worker residence.

This information should be linked to a description of work performed (scope of work) so that the job outcomes can be evaluated on a project-by-project basis.

In addition, we recommend using an online labor compliance reporting system to ensure accurate and consistent data, generate comprehensive reports, and facilitate reporting for LEAs, contractors and the state.

We appreciate this opportunity to comment and look forward to reviewing the final draft of the Guidelines. If you have any questions, please do not hesitate to contact our office.

Kindest Regards,

A handwritten signature in blue ink, appearing to read 'Bret Barrow', with a long horizontal flourish extending to the right.

Bret Barrow  
Energy Policy Liaison