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Comments of SMART Local 104 and the Western States Council of SMART on Workforce Standards, State-Approved Apprenticeship, and Equitable Implementation of the EPIC 5 Investment Plan

Additional submitted attachment is included below.

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

Application of the California Energy Commission for Approval of
Electric Program Investment Charge Proposed 2026–2030
Investment Plan

Application 26-08-017

**JOINT RESPONSE OF SMART LOCAL 104 AND
THE WESTERN STATES COUNCIL OF SMART**

SMART, Sheet Metal Workers’ Local Union No. 104 (Local 104) and the Western States Council of the International Association of Sheet Metal, Air, Rail, and Transportation Workers (WSC) submit this joint response to the California Energy Commission’s (CEC) EPIC 5 application. Our members fabricate, install, test, adjust, balance, commission, service, and maintain the mechanical systems on which building electrification depends. We support EPIC’s clean-energy mission and request specific direction on workforce implementation.

This response builds on Local 104’s June 11 comments (TN270558), WSC’s June 12 comments (TN270598), and our continued engagement with EPIC, including the September 29 Symposium. The discussions of affordability, deployment, and use of existing infrastructure reinforced a point central to our earlier comments: California’s state-approved apprenticeship system is infrastructure, too.

The Plan summarizes our written and workshop comments in Appendix A, pages A-1–A-2, A-45, and A-48. Staff acknowledges High-Road principles and says it “may consider supporting workforce efforts as complementary portions of EPIC-funded projects as EPIC 5 solicitations are developed.”¹ We appreciate that acknowledgment. We now ask the CPUC and CEC to carry it into identifiable requirements, partnerships, and measures of results.

¹ CEC, The Electric Program Investment Charge 2026–2030 Investment Plan, CEC-500-2026-022-CMF (Aug. 2026), Attachment 1 to TN272170 (“Plan”), Appendix A, pp. A-1–A-2, A-45, A-48. Plan references use printed page numbers, not PDF viewer numbers.

Our request is not to turn EPIC into a general workforce program. It is to use California's existing training infrastructure to help funded technologies perform as intended and enable working families to participate in the clean-energy economy.

1. Build on the apprenticeship infrastructure California already has

California should apply the same discipline to workforce investment that it applies to energy infrastructure: use established capacity before paying to duplicate it. Our labor-management training centers already bring together facilities, instructors, curricula, employers, and experienced technicians. Workers and contractors sustain this system through contributions tied to hours worked, and journey-level workers return for advanced training as technologies change.²

State-approved apprenticeship is more than a course or certificate of attendance. The Division of Apprenticeship Standards oversees on-the-job training and classroom instruction. Approved standards must cover the work processes of the occupation, supervised experience, related instruction, progressive wages, and employee benefits.³ This foundation prepares technicians to understand systems, not just one manufacturer's product. Air distribution, controls, testing and balancing, service, and diagnostics remain relevant as equipment changes. Emerging-technology instruction should build on that foundation, with continuing education throughout a career.

Across California's sheet metal/HVAC apprenticeship training-center network, our organizations report a backlog of more than 3,000 applicants seeking an opportunity to train. These are prospective apprentices, representing future capacity alongside the skilled workforce already serving California.

In our experience, the constraint is not an aging workforce or a lack of people willing to learn. A central barrier is the lack of meaningful incentives for contractors to invest in comprehensive apprenticeship and create career opportunities offering family-sustaining wages, healthcare, retirement benefits, and long-term stability. California's own funding and procurement practices can contribute to this problem when grant requirements and programs do not sufficiently distinguish between contractors who make these investments and those operating under substantially lower labor standards. Inadequate oversight and enforcement of applicable prevailing wage and related labor requirements can further disadvantage responsible contractors, effectively allowing public funding to reward lower labor costs rather than workforce development and quality. Applicants need employers

² Skilled + Trained HVAC, California HVAC Training Standards, sections on curriculum, training centers, and apprenticeship funding (accessed Oct. 1, 2026).

³ California Department of Industrial Relations, DAS Apprenticeship overview; Cal. Code Regs., tit. 8, § 212, introductory paragraph and subs. (a)(1), (a)(5), and (a)(6).

willing to hire, train, and retain them. Funding training without ensuring that publicly supported projects create demand for these skilled workers leaves the underlying problem unresolved.

2. Connect workforce quality, affordability, and a Just Transition

A heat pump is part of a building system. Its installation requires understanding airflow, ductwork, controls, ventilation, electrical coordination, code compliance and operating conditions. Our June comments therefore addressed the technicians performing the work, not simply contractor participation or attendance at a product-training session. Installation, commissioning, testing, and maintenance must be part of how EPIC evaluates successful technology deployment. Workforce measures should be assessed against delivered performance and life-cycle cost, including corrective work and maintenance, not labor price alone.

The CEC's Annual Report identifies workforce and contractor availability as a challenge, includes workforce development within Market Facilitation, and discusses High Road career paths for environmental and social justice communities.⁴ The question is how to turn that recognition into durable capacity, rather than separate short-term training efforts for each new technology.

Rebates, efficient equipment, and lower bills provide important benefits. They are not the whole of an equitable transition. Residents should also have access to state-approved apprenticeship programs where they work and earn wages while learning their trade, building careers with family-sustaining wages, health coverage for the entire family, retirement benefits, and opportunities for advancement. A resident trained today can help install, operate, and improve successive generations of clean-energy systems over a career that may span 40 years.

That is the hand up we are asking EPIC to help make possible. Stable careers can strengthen a family's ability to meet its energy and other household costs. Seeing family members and neighbors participate in the work can also build trust and a direct stake in the transition. Those benefits complement, rather than replace, demonstrated energy savings, safety, and reliability.

The Plan already identifies local workforce outcomes in Initiative 5 (p. 90), local training and contracting in Topic 5.3 (p. 107), and HVAC technician and contractor training in Topic 5.4 (p. 111). These provisions provide places to implement our June requests without creating a separate initiative.

⁴ CEC, Electric Program Investment Charge 2025 Annual Report, CEC-500-2026-024-CMF (Aug. 2026), pp. 4, 6 n.2, and 36.

3. Put the workforce commitments into project requirements

We request the following implementation direction, with requirements proportionate to the work and technology involved.

Use existing apprenticeship and journey-level training programs.

For projects with workforce needs, require applicants to identify relevant state-approved apprenticeship programs and explain how existing facilities, instructors, and training will be used. Emerging-technology training should include hands-on instruction and competency assessment where appropriate. Topic 5.1 already addresses contractor familiarity and standardized installation practices (p. 99); Topic 5.2 includes workforce development and contractor adoption (p. 102). These activities can build on established programs rather than duplicate them.

Carry forward Skilled and Trained Workforce requirements.

We renew our request for verifiable Skilled and Trained Workforce requirements for EPIC-funded construction, installation, commissioning, testing, maintenance, and relevant fabrication. Solicitations should define coverage, qualifications, apprenticeship participation, documentation, and responsibility for compliance, consistent with applicable law. Coverage should expressly address relevant work on modular, prefabricated, and factory-assembled systems; moving work off site should not eliminate workforce accountability.

Grant and program requirements should reflect the nature of the work being funded. A single grant may include laboratory research, software development, workforce training, and construction, each of which requires different qualifications, performance standards, and methods of evaluation. Requirements appropriate for one activity should not automatically be applied to another. Construction, in particular, requires demonstrated technical competency because the quality of the work directly affects building performance, occupant health and safety, and the long-term value of public investments.

For construction-related activities, qualifications should therefore emphasize demonstrated knowledge, practical skills, and the ability to retain and apply those skills, rather than relying solely on attendance-based, short-duration training. Where specific qualifications are necessary to perform the work competently, they should be established as minimum requirements rather than treated merely as preferences in grant application scoring.

Require a workforce implementation plan and accountable delivery.

Each EPIC-funded project should address workforce implementation at a level appropriate to its scope. Where relevant, the plan should identify training partners, worker qualifications, paid apprenticeship opportunities, family-sustaining wages and benefits, community access, retention, and advancement. Accepted commitments should become agreement deliverables, with a responsible party, reporting schedule, and a process for addressing deficiencies.

Measure job quality and include community workforce partners.

Workforce reporting should distinguish training attendance from demonstrated competency, job placement from sustained employment, and job counts from family-sustaining careers. Track apprenticeship participation and completion, wages, family health and retirement benefits, retention, advancement opportunity, and access for underrepresented residents. Topic 8.1 already contemplates workforce scoring incentives and reporting on jobs and local economic participation (p. 159). Those measures should capture the outcomes we requested in June.

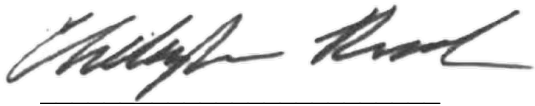
Under Initiative 4 (Plan, pp. 75–76), recognize labor organizations and labor-management apprenticeship programs as community-capacity partners alongside tribes, community colleges, and community-based organizations. Clarify their participation and eligibility rather than assume every labor organization meets a particular solicitation’s definition of a CBO. Their technical knowledge and employer relationships can connect community participation to actual career opportunities.

4. Continued collaboration

We ask that workforce implementation be included among the issues considered in acting on this application. We do not object to the proposed ratesetting category or propose an alternative schedule, and do not request an evidentiary hearing at this time.

Local 104 and WSC are more than willing to meet with CEC, CPUC, and EPIC staff to answer questions and support implementation. We can help connect staff with training centers, instructors, contractors, and technicians and work through practical qualifications and reporting measures. Our goal is successful technology deployment and lasting benefits for California’s working families.

Respectfully submitted,



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