

DOCKETED

Docket Number:	15-IEPR-05
Project Title:	Energy Efficiency
TN #:	204290
Document Title:	Richard "Dick" Reed Comments: Existing Building Energy Efficiency Draft Action Plan Docket
Description:	N/A
Filer:	System
Organization:	Richard "Dick" Reed
Submitter Role:	Public
Submission Date:	4/21/2015 3:50:21 PM
Docketed Date:	4/21/2015

Comment Received From: Richard "Dick" Reed

Submitted On: 4/21/2015

Docket Number: 15-IEPR-05

Existing Building Energy Efficiency Draft Action Plan Docket No. 15-IEPR-05

Additional submitted attachment is included below.



IBEW
International Brotherhood of
Electrical Workers, AFL-CIO

Compliance Division
297 North Marengo Avenue
Third Floor
Pasadena, CA 91101
PHONE: (626) 449-8058
FAX: (626) 449-8125

April 21, 2015

To: California Energy Commission, Dockets Office, MS-4

From: Richard "Dick" Reed, President, Senior Assistant Business Manager, International Brotherhood of Electrical Workers Local Union 11 (IBEW Local 11)

Re: **Existing Building Energy Efficiency Draft Action Plan Docket No. 15-IEPR-05**

Thank you for providing my office with the opportunity to submit comments on the Existing Building Energy Efficiency Draft Action Plan. The International Brotherhood of Electrical Workers Local Union 11 (IBEW Local 11) represents over 11,000 workers in Los Angeles County. Our Electrical Training Institute is also the largest electrical training facility in North America, and provides a wide variety of energy efficiency and renewable energy in-class and hands-on training opportunities (<http://www.laett.com/>). We look forward to partnering with the California Energy Commission to reduce energy consumption, to reduce greenhouse gas emissions, and to create quality career opportunities.

The current AB 758 Draft Action Plan is significantly improved from the previous draft with respect to workforce education & training strategies. We agree that the Action Plan's goals of proactive and informed leadership, data-driven decision-making, high performance and innovation, education and outreach, and public accessibility can be better accomplished with highly competent and well-trained contractors and workers. In addition, the recommendations from the Don Vial Center IOU workforce assessment report that is regularly cited in the Action Plan reflect some of the best practices and recommendations regarding workforce and contracting issues and we strongly support the inclusion and prioritization of the Don Vial Center's recommendations.

In addition, we have several comments that we believe will help the State of California meet the goals of AB 758.

- 1) The proposed expansion of AB 1103 energy use disclosure policy as well as local municipal benchmarking policies that require active compliance with benchmarking requirements, and encourages on-going monitoring and maintenance, as well as opportunities to identify retrofit needs and implement (Pg. ix)
- 2) We believe that the use of data-tracking, analytics, and 3rd party assessments are essential, though there should be more standardization on what data is tracked, how is it tracked, and how can it meet AB 758 goals (Pg. ix)
- 3) The Existing Building Energy Efficiency Collaborative that will be created should include representatives from the Building and Construction Trades union and contractors. These groups are two of the primary stakeholders that will be working on the buildings and should have input on future development in the region (Pg. x)
- 4) We agree that performance-based evaluations of retrofits are very important. This means that quality installation and maintenance is critical to the continued success of energy efficiency goals in the state (Pg. 69).
- 5) Energy Services Companies (ESCOs) are not the only types of business models that can provide turnkey solutions for large commercial and public sector projects. Additional models and types of firms should be discussed in this

section, including construction contractors that have access to financing and high quality workers that can provide similar turn-key services as ESCOs (Page 70)

- 6) Quality installation is identified as one of the biggest challenges to achieving full projected efficiency potential. Page 71 discusses the need for feedback practices that can “ensure the long-term performance or accountability from the technicians and professionals completing the installation work.” Technicians and professionals should have industry-recognized certifications and standards that can improve performance and accountability.
- 7) Performance validation tools are mentioned on Page 72. This information can much better help officials make better decisions if the data also includes data on contractor and workforce qualifications, classification, etc., which the Action Plan indicates greatly impacts the resulting energy performance of a building.
- 8) Certifications and proper licensing should be clearly identified and emphasized for all different building types and uses, not just in the small and medium building arena (Pg. 72)
- 9) Registered apprenticeship programs are the best providers of comprehensive construction training in California, and apprenticeship should be included in the list in the first paragraph on Page 72.
- 10) We agree that pathways towards long-lasting careers in energy efficiency are not clear in California and that the Division of Apprenticeship Standards should be highly involved in improving the pathway towards high quality careers for entry-level as well as incumbent workers (Page 73)
- 11) Based on the Investor-Owned Utilities submission to the CPUC, they do not plan to address the full spectrum of the Don Vial Center report over the coming years. This is in contrast to what Draft Action Plan states on Page 74. However, the IOUs should be implementing the full spectrum of the Don Vial Center report because a highly-qualified contractor and workforce community are critical to achieving the goals of AB 32 and AB 758.
- 12) We completely agree with the following sentence on Page 74, “Just as the concept of high performance buildings needs to be integrated into California business models, so the concept of quality assurance needs to be ingrained in the workforce and its supervisory ranks to ensure performance is achieved. To realize building improvements and system installations that meet or exceed code requirements, practitioners must be better versed in quality assurance at all stages of project design and implementation.” In order to ingrain this process of quality assurance in the workforce and supervisory ranks, there must be clear and standardized training, certification, and licensing requirements that will assure high performance and continued public investments in energy efficiency in existing buildings.

Quality contracting procedures and quality workforce development are the cornerstones for successful deployment of energy efficiency programs in the State of California. We hope that the California Energy Commission will consider and act on our comments, which we believe will lead to high levels of success for energy efficiency efforts throughout the state. Please do not hesitate to reach out to my office with additional questions and discussion points. You can contact me, Dick Reed, Senior Assistant Business Manager, at reed@ibew11.org or by phone at 626-243-9700.