

## DOCKETED

<b>Docket Number:</b>	16-OIR-02
<b>Project Title:</b>	SB 350 Barriers Report
<b>TN #:</b>	211909
<b>Document Title:</b>	Brightline Defense Comments on Proposed Scope of SB 350 Barriers Report
<b>Description:</b>	N/A
<b>Filer:</b>	System
<b>Organization:</b>	Brightline Defense/Dilini Lankachandra
<b>Submitter Role:</b>	Public
<b>Submission Date:</b>	6/20/2016 3:58:36 PM
<b>Docketed Date:</b>	6/20/2016

*Comment Received From: Dilini Lankachandra*

*Submitted On: 6/20/2016*

*Docket Number: 16-OIR-02*

**Comments of Brightline Defense on Proposed Scope of SB 350 Barriers Report**

*Additional submitted attachment is included below.*



June 20, 2016

Alana Mathews, Public Advisor  
Public Advisor's Office  
California Energy Commission  
Dockets Office, MS-4  
1516 Ninth Street  
Sacramento, CA 95814

VIA E-MAIL

RE: BRIGHTLINE'S COMMENTS ON SB 350 BARRIERS STUDY PROPOSED SCOPE

Dear Ms. Alana Mathews,

Brightline is a policy advocacy nonprofit that works to empower communities and create sustainable environments, particularly in improving workforce development efforts and building green assets for communities in need. To promote progressive reforms in energy efficiency policies, Brightline combines multiple skill sets including legal analysis, community organizing, and policy research. We appreciate this opportunity to provide comments on proposed scope of the SB 350 Barriers Study.

Generally, Brightline commends California Energy Commission (CEC) staff for proposing a comprehensive scope for the SB 350 Barriers Study. Brightline would like to add a few thoughts on the process and content of the Study, namely that CEC should take efforts to adequately value the time and input of low-income stakeholders, that it should clearly identify low-income communities, and that it should address how to leverage energy equity efforts into creating job training, job placement, and career pathways for those residents.

### **1. The Study Should Value the Time and Input of Low-Income Stakeholders**

No group better understands the barriers to adoption of energy efficiency measures and clean energy in low-income communities than low-income residents themselves. Brightline is glad that the CEC plans to host workshops in low-income communities and would urge the CEC to give sufficient attention to concerns and ideas that emerge from those meetings. We would also like to encourage the CEC to take proactive steps to ensure that residents of low-income communities actually make it to these meetings.

The CEC can accomplish this goal through several concrete strategies. First, the CEC should actively work with community-based organizations (CBOs) to identify the most effective ways to engage with particular communities. Second, we urge the CEC to be thoughtful about potential language barriers by providing translated materials and oral translation as appropriate for the community's needs. Finally, the CEC should endeavor to make it as easy as possible to attend outreach sessions by scheduling meeting times when residents are available, which is often in the evening, providing transportation assistance to and from the meeting, and providing food for those who attend.

## **2. The Study Should Accurately Identify Low-Income Communities**

For the CEC to conduct outreach to low-income communities, it will have to first identify them. We believe that a highly granular approach to identifying these communities would be the most effective.

Wealthy regions in our state often contain persistent pockets of poverty that are difficult to spot when data for the region is aggregated. For example, while the Bay Area as a whole is quite wealthy, it houses neighborhoods like the Tenderloin and Bayview-Hunters Point in San Francisco as well as Marin City and San Rafael's Canal Area in Marin County, all of which have staggering rates of poverty and unemployment. The CEC should take into account factors like area median income and cost of living to accurately identify low-income communities and ensure that they are not obscured by surrounding wealth.

## **3. The Study Should Address Workforce Issues in Low-Income Communities**

For clean energy to truly benefit low-income communities, it must be accompanied by job training, job placement, and career pathways for low-income residents. In June 2016 the California Workforce Development Board has recognized actual job placement as paramount in workforce development policy, noting in its Unified Strategic Workforce Development Plan that “[t]he real test of whether programs are serving the needs of both employers and workers is whether those who are receiving services are getting good jobs that put them on a path to upward success.”<sup>1</sup> The SB 350 Barriers Report should address this issue by identifying barriers to clean energy job creation in low-income communities as well as best practices for leveraging clean energy programs into good paying jobs. Specifically, local hiring policies have been one effective way to create access to local jobs and guarantee job placement for local underemployed and unemployed residents.


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<sup>1</sup> California Workforce Development Board, *California's Unified Strategic Workforce Development Plan*, June 2016, p. 13. Available at [http://cwdb.ca.gov/WIOA\\_Unified\\_Strategic\\_Workforce\\_Development%20Plan.htm](http://cwdb.ca.gov/WIOA_Unified_Strategic_Workforce_Development%20Plan.htm).

To create strong policy designs around job placement and career pathways, the study should consult a broad range of stakeholders in workforce development. In the SB 350 Energy Equity Experts Working Session convened at the Greenlining Institute on June 20, Asian Pacific Environmental Network (APEN) highlighted the need to include local workforce development boards and other city-oriented workforce agencies. In addition, California Center for Sustainable Energy (CSE) mentioned Grid Alternatives as another relevant stakeholder. Brightline agrees with both APEN and CSE on consulting with these stakeholders for the study, and we believe discussion should also include job training service providers such as Rising Sun Energy Center, Asian Neighborhood Design, A. Philip Randolph Institute, among many others.

Brightline thanks the California Energy Commission for the opportunity provide comments on the proposed scope of the SB 350 Barriers Study and looks forward to additional opportunities to participate in the future.

Sincerely,



Eddie H. Ahn  
Executive Director  
Brightline Defense



Dilini Lankachandra  
Staff Attorney  
Brightline Defense