

## DOCKETED

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*Comment Received From: Ross Nakasone*

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**Comments on SB 350 Barriers Report Workshops - 16-OIR-02**

*Additional submitted attachment is included below.*

August 25, 2016

Alana Mathews  
California Energy Commission  
Commission Dockets Office, MS-4  
1516 Ninth Street  
Sacramento, CA 95814  
VIA E-MAIL

**Re: Comments on SB 350 Barriers Report Workshops - 16-OIR-02**

Dear Ms. Mathews:

On behalf of the community, labor and employer organizations below, we respectively submit comments on the SB 350 Barriers Report following the August 12 workshop.

As SB 350 has recognized, climate policy should aid the state's most environmentally impacted and socioeconomically disadvantaged communities. It should do so by setting a number of goals including greater economic equity through high-quality, career-track jobs in clean economic growth sectors. To meet this goal, California's climate policies should:

- Generate jobs with family-supporting wages, benefits, career paths, and safe and healthy working conditions.
- Support prevailing wage and skilled workforce standards in relevant industries
- Increase access to career-track jobs for workers from disadvantaged communities.

While California climate policy has on balance created jobs particularly in renewable energy generation and energy efficiency, there remain questions about the quality of those jobs. To address job quality, we recommend linking workforce, contractor and training efforts to climate-related programs including the various agencies' energy efficiency programs. The Energy Commission consider the following:

- **Create inclusion programs** to broaden opportunities for workers from minority, low-income and disadvantaged communities to enter rewarding careers and access climate-related jobs including those in energy efficiency. These inclusion programs should be tied, where relevant, to state-certified apprenticeship, which provides the structure and pathways for successful inclusion programs in the construction and utility industries, and where possible, implemented through community workforce agreements that tie together labor standards and targeted or local hire provisions.
- **Incorporate contractor and workforce standards** into the program requirements for climate-related programs to help ensure both good-paying jobs for workers including those from disadvantaged communities, but also to ensure quality workmanship. This is particularly relevant in the energy efficiency sector. SB 350 requires the adoption, implementation and enforcement of a "responsible contractor policy for use across all ratepayer-funded energy efficiency programs that involve installation or maintenance,

or both installation and maintenance, by building contractors to ensure that retrofits meet high-quality performance standards and reduce energy savings lost or foregone due to poor-quality workmanship.”<sup>1</sup> Where feasible, these community workforce agreements should be the vehicle for incorporating these standards.

- **Redesign Workforce Education and Training programs** to allocate resources for pre-apprenticeship programs that successfully place workers in state-certified apprenticeship and other programs with a proven track record of placing disadvantaged workers into career track training and jobs, and to support efforts toward greater alignment with, leveraging of, influence over, support (including funding) for California’s main training and education institutions, including community colleges, the state-certified apprenticeship system, colleges and universities.

The above comments are intended to assist the Energy Commission in setting policies and programs that reduce greenhouse gases and related pollutants in ways that promote economic, social, and environmental equity. We thank you for the opportunity to comment and look forward to continued engagement on this issue.

Sincerely,

JB Tengco  
West Coast Director  
BlueGreen Alliance

Greg Partch  
Executive Director  
California State Pipe Trades Council

Jack Buckhorn  
Co-chair, IBEW/NECA  
California and Nevada Statewide LMCC<sup>2</sup>

Rev. Kirsten Snow Spalding  
Executive Director  
San Mateo County Union Community Alliance

Laura Muraida  
Research Director  
Strategic Concepts in Organizing &  
Policy Education

David Dias  
Business Representative  
Sheet Metal Workers Local 104

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<sup>1</sup> See Public Resources Code Sec. 25943(a)(3) and (4)

<sup>2</sup> The International Brotherhood of Electrical Workers/National Electrical Contractors Association California and Nevada Statewide Labor Management Cooperation Committee represents over 1,000 electrical contractors who employ over 40,000 electrical workers.