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Brightline Defense Project Comments on Staff Draft Recommendations

Additional submitted attachment is included below.



October 27, 2016

California Energy Commission
Docket Office, MS-4
1516 Ninth Street
Sacramento, CA 95814

Via email

Re: Docket No. 16-OIR-02

**Brightline’s Comments on the Staff Draft Recommendations for the
Energy Commission’s SB 350 Low Income Barriers Study**

I. Introduction.

Brightline’s comments on the SB 350 Barriers Study Draft Report highlighted the need to develop workforce programs that focus on career pathways, so that low-income and disadvantaged communities can receive both the energy savings and economic benefits associated with energy efficiency and renewable energy programs (“EE and renewable programs”).¹ Our comments also pointed out the need to strengthen partnerships with community based organizations (“CBOs”), as they have the rapport needed to collect sensitive data and to EE and renewable programs. The comments below further build upon our prior work in workshops for the California Energy Commission (“Commission”) and expand on some of the points made in the Staff Recommendations that relate to workforce development and access to solar.

II. The State should create a Green Workforce Fund.

At the SB 350 Clean Energy Jobs Workshop held on July 20, 2016, Brightline voiced the need to develop workforce programs. Brightline agrees with the Commission that EE programs

¹ Brightline’s Comments on SB 350 Barriers Study Draft Report, Docket No. 16-OIR-02, TN # 213855

need to provide access to high-quality jobs in the clean energy economy.² Apprenticeship programs promoting the green economy are not attractive substitutes to service sector or construction jobs because they cannot always guarantee placement in a long term job, especially one with good-paying wages. Therefore, access to high-quality jobs needs to expand. Likewise, Brightline agrees with the recommendation that all state programs should collaborate more extensively with CBOs. CBOs such as Rising Sun have already implemented programs that mirror the Staff Recommendations.³ For example, Rising Sun’s Youth Energy Services program provides access to entry-level jobs in clean energy by hiring youth from the communities receiving the services.⁴ Workforce programs developed as part of SB 350 should partner with CBOs running successful programs, like Rising Sun, instead of trying to reinvent the wheel.

However, funding is necessary in order for these programs to succeed. One of the challenges that CBOs like Rising Sun face is that limited funding prevents them from providing wages higher than the minimum wage. While the Recommendation that state programs should “leverage and allocate resources” makes intuitive sense, additional resources are needed to collaborate with community based organizations in developing local workforce.⁵ EE and renewable programs have limited budgets that prevent them from meeting demand for their services. If programs dedicate portions of their service provision budgets for coordination efforts with CBOs and workforce development, then the amount of actual services they can provide will be reduced. Instead, Brightline urges the Commission to recommend that the state create a Green Workforce Fund, dedicated specifically for workforce development programs. The Fund, unrestricted by the achievement of direct greenhouse gas emissions or cost-effectiveness

² Recommendation 8(c); see also Brightline’s Comments, at 4-5.

³ Rising Sun is a CBO which develops local workforce in low-income communities by hiring youth from those communities, and Recommendation 11(a) calls for partnering with such organizations.

⁴ <http://risingsunenergy.org/programs/california-youth-energy-services/>

⁵ Recommendation 8.

requirements, could finance the desired workforce outcomes of this and other GHG reduction programs. If workforce development, employment, and green jobs for individuals in low-income and disadvantaged communities are a true priority of the GHG reduction funds and of the State, then dollars should be allocated accordingly.

III. Workforce development programs should focus on job placement strategies and establish wage standards.

Brightline also agrees that EE and renewable programs should be available to both low-income and disadvantaged communities.⁶ One way to do so is by establishing local hire goals and including them in the request for proposal (“RFP”). Setting enforceable expectations and including them within the RFP will ensure that whoever is awarded the contract will lead to the hiring of local, low-income and disadvantaged residents. For example, San Francisco’s landmark Local Hiring Policy for Construction, which moved beyond typically lax “good faith” efforts, illustrates the success of such enforceable policies. Five years after its enactment, the local hiring policy is now celebrated as a success for increasing local hiring from 20% to 45%.⁷ This policy has also seen corresponding increases in gender and racial diversity on construction worksites.

In addition, workforce development programs need to provide sustainable wages. Low-income and disadvantaged communities need access to family-sustaining jobs and careers that can help raise individuals from those communities out of poverty. Brightline is concerned that workforce programs will adopt local minimum wage laws as standard wages for EE and renewable programs. Minimum wages are insufficient to raise individuals and families out of poverty. Job placement in good-paying jobs continues to be a priority for unemployed and

⁶ Recommendation 11(b) and 12.

⁷ SF Examiner, “Local hiring law succeeding despite concerns over skilled-labor supply,” June 7, 2016, *available at*: <http://www.sfexaminer.com/local-hiring-law-succeeding-despite-concerns-skilled-labor-supply/>

underemployed communities. The final Recommendations for the Barriers Study should therefore emphasize job training and workforce development programs that allow individuals and families from low-income and disadvantaged communities to rise out of poverty.

IV. Access to solar needs to expand.

Brightline welcomes the Staff Recommendations addressing the need to make solar programs more accessible and to expand on current solar programs.⁸ The Commission indicates that publicly owned utilities should develop pilot programs similar to SASH/MASH for low-income customers.⁹ Brightline would like to point out that Assembly Bill 693 provides such a program. The California Public Utilities Commission currently has an ongoing proceeding to determine how to implement the bill.¹⁰ Brightline urges the Commission to voice its support for the implementation of the bill as soon as possible and in a manner that promotes solar in low-income communities.

V. Conclusion

Brightline thanks the Commission for the continued opportunity to engage in this matter.

Sincerely,

/s/ Eddie H. Ahn
Executive Director
Brightline Defense

/s/ Ivan Jimenez
Legal Fellow
Brightline Defense

⁸ Recommendation 1 states that the Legislature should consider supporting community solar efforts.

⁹ Recommendation 3(c).

¹⁰ Brightline and a coalition of CBOs submitted a proposal to the CPUC on the implementation of the bill. *See* R.14-07-002, *Joint Proposal by the California Housing Partnership, California Environmental Justice Alliance, Brightline Defense Project, Natural Resources Defense Council, and National Housing Law Project (Nonprofit Solar Stakeholders Coalition) on Implementation of Assembly Bill 693*, August 3, 2016, available at: <http://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M167/K502/167502112.PDF>