

## DOCKETED

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**\*FINAL\* Rising Sun Energy Center Comments: SB 350 Staff Draft Barriers Study Recommendations**

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*Additional submitted attachment is included below.*



October 28, 2016

California Energy Commission  
Dockets Office, MS-4  
1516 Ninth Street Sacramento, CA 95814-5512

Via email

Re: Docket No. 16-01R-02

## **Comments of Rising Sun Energy Center on SB 350 Low Income Barriers Staff Draft Recommendations**

Rising Sun Energy Center has reviewed the Staff Draft Recommendations released as an addendum to the “Study of Barriers and Solutions to Energy Efficiency, Renewables, and Contracting Opportunities among Low-Income Customers and Disadvantaged Communities (Staff Draft)”. Rising Sun supports these recommendations overall, and appreciates the California Energy Commission’s (CEC) responsiveness to stakeholder guidance and feedback in both the draft report and these recommendations. In particular, we want to raise up and expand on several recommendations that we feel would be particularly impactful for low-income communities in addressing the barriers identified in the report.

- **Recommendation 5:** We agree that standardized metrics to inform program design as well as measure program success are of crucial importance.
- **Recommendation 7:** We want to highlight the need to streamline programs that serve the same residents, particularly those programs that offer similar services. Multiple energy efficiency programs that each call for a different application process and different income requirements while offering similar services causes customer confusion, frustration, and lowers uptake. At a minimum, eligibility for one low-income program should automatically qualify a resident for the others; in an ideal scenario, all residential energy (and perhaps, as this recommendation suggests, water, resilience, and housing) programs would fall under the same entity, with a streamlined application process for layered and coordinated services. We also appreciate the recommendations to:
  - Expand direct-install energy programs to include water-efficient appliances
  - Initiate pilot programs that can serve whole neighborhoods, not just house-by-house
  - Ensure energy programs have funds for health and safety work
  - Establish common definitions and measurement of NEBs (and, we would add, assign value to those NEBs, rather than counting them against cost-effectiveness)
- **Recommendation 8:** Rising Sun wishes to draw particular attention to the recommendation to “leverage and allocate resources...to develop local workforce to expand access to entry-level and high-quality jobs in the clean energy economy”. Our observation is that many

state funding opportunities place an emphasis on the importance of workforce development, and require specific workforce partnerships and outcomes, while restricting funds from being spent on workforce development activities such as training, case management, and job placement. We join Brightline Defense's suggestion to create a Green Workforce Fund. Such a Fund should be unrestricted by the achievement of direct greenhouse gas emissions or cost-effectiveness requirements, to finance the desired workforce outcomes of energy efficiency, clean energy, and other GHG reduction programs. If green training and careers for individuals in low-income and disadvantaged communities are a true priority of clean energy programs and of the State, then dollars should be allocated accordingly.

- **Recommendation 11:** We join the staff recommendations here to ensure that state-administered low-income programs have a local workforce development component, and again recommend that this component be funded to ensure goals are met in a meaningful way. We also join the recommendation that companies and organizations receiving state or utility funding set local hire goals to employ individuals from low-income communities, and that workforce standards be part of the requirements – including wage floors with benefits, with exceptions for participants in training programs, internships, or other on-the-job training and learning opportunities. Green jobs need to be quality jobs. Local CBO partnership will be more significant and impactful if these programs promote quality, family-sustaining jobs and careers with wages that can raise individuals out of poverty, rather than keeping them in minimum wage positions. We also feel that the articulation of a career pathway within these programs, to encourage career growth and economic self-sufficiency beyond the duration of any one funding cycle, is worth emphasizing.

Rising Sun again thanks the CEC for its commitment to this topic, for the recommendations proposed, and for the opportunity to comment and engage in this process.

Sincerely,

/s/ Jodi Pincus  
Executive Director  
Rising Sun Energy Center

/s/ Julia Hatton  
Director of Youth Programs  
Rising Sun Energy Center

### **About Rising Sun Energy Center**

Rising Sun is a nonprofit workforce development organization operating since 1994 that provides green training and employment opportunities to youth and low-income adults, and that offers free residential energy efficiency and water conservation assessments, installations, and education to renters and homeowners in six Bay Area and Central Valley counties. Rising Sun runs two primary programs: California Youth Energy Services (CYES), which employs local youth to provide Green House Calls in their communities, and Green Energy Training Services (GETS), a pre-apprenticeship training, case management, and job placement program that prepares low-income adults who experience barriers to employment for careers in construction, energy efficiency, solar, and the building trades.