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Joint Comments on SB 350 Barriers Report (Part A) 20161208

Additional submitted attachment is included below.

December 8, 2016

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

Re: Comments on the Revised Staff Draft of the SB 350 Low-Income Barriers Study (Part A) - 16-OIR-02

Dear Commissioners:

On behalf of the community, labor and business organizations below, we respectively submit comments on the Revised Staff Draft SB 350 Low-Income Barriers Study (Part A) issued on December 1, 2016. As we have said in prior comments, the lack of access for those in disadvantaged and low-income communities to good career-track clean energy jobs represents a significant barrier and without such access California will not fully realize the potential of these programs to serve low-income households and those in disadvantaged communities.

While we appreciate some aspects of the report, the recommendations should be refined to better ensure access to *high-quality* jobs. Without ensuring job quality and access, the report will fall short of “ensur[ing] that economic benefits of public investments are realized by low-income customers and disadvantaged communities.”¹ While we strongly agree “developing local workforce participation in clean energy programs is integral to enabling the full range of benefits for low-income customers,”² simply providing disadvantaged workers training is not enough; training must lead to employment opportunities and family-sustaining, career-track jobs.

To ensure that California’s clean energy programs better ensure economic benefits for disadvantaged communities, we ask the Commission to consider the below, with the overarching comment that job quality and access and workforce recruitment and retention should not be limited to just local small businesses.

- **Contractor and workforce standards** in energy-related program requirements to help ensure investments produce good jobs and quality workmanship. As the report recognizes, this should include a responsible contractor policy that sets apprenticeship standards.³ However, the recommendations do not reflect this issue.
- **Strong workforce inclusion requirements** in individual agency programs, through requirements, incentives or inducements, including targeted local hire goals for workers from disadvantaged communities and low income households and individuals

¹ Revised Staff Draft Report - Low-Income Barriers Study, Part A: Overcoming Barriers to Energy Efficiency and Renewables for Low-Income Customers and Small Business Contracting Opportunities in Disadvantaged Communities, December 1, 2016, p. 4.

² Ibid., p. 1.

³ Ibid., p. 81.

facing barriers to employment, that account for the needs of workers from disadvantaged communities.

- **Successful pathways** for residents from low-income and disadvantaged communities into and through programs with demonstrated track record of success in recruiting, training and placing workers in good jobs. We support the recommendation calling for a green workforce fund that support community-based organizations and apprenticeship programs that train and hire locally from disadvantaged communities.
- **Jobs tracking** metrics that measure program employment impacts. Job tracking allows agencies to generate reliable data and measure direct job outcomes from public investments. This could help to better understand the quantity and quality of jobs being created, and job accessibility for workers from disadvantaged communities and individuals facing barriers to employment.

We are very disappointed that our previous comments on these issues have been all but ignored. We would like a written response to each of our recommendations, outlining why they were ignored or how they were addressed.

We want to thank the Energy Commission and staff for their hard work on developing this report and look forward to continued engagement.

Sincerely,

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⁴ 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.