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May 7, 1999

VIA FEDERAL EXPRESS

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

<b>DOCKET</b> 98-AFC-1
DATE <u>MAY 07 1999</u>
RECD. <u>MAY 10 1999</u>

11038

Re: Docket No. 98-AFC-1

Dear Madam or Sir:

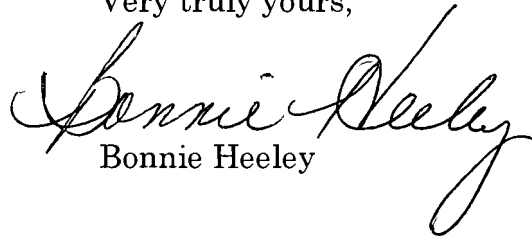
Enclosed are the following documents:

Original + 13 copies of **Opening Brief of California Unions for Reliable Energy.**

Please file the original, endorse copies and return in the enclosed, stamped, self-addressed envelope provided for your use.

Thank you for your assistance in this matter.

Very truly yours,

  
Bonnie Heeley

/bh  
Enclosures

**STATE OF CALIFORNIA**

**Energy Resources Conservation  
and Development Commission**

In the Matter of:

The Application for Certification  
for the Pittsburg District Energy Facility

Docket No. 98-AFC-1

**OPENING BRIEF OF  
CALIFORNIA UNIONS FOR RELIABLE ENERGY**

**May 10, 1999**

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Attorneys for CURE

## **I. INTRODUCTION**

CURE supports approval of the Pittsburgh District Energy Facility (“PDEF” or “the project”) because of the socioeconomic benefits that it will bring to the local community.

## **II. SOCIOECONOMIC BENEFITS**

PDEF’s decision to hire highly-qualified union workers to construct, operate and maintain the project will provide many socioeconomic benefits. First, the wages and benefits that these workers earn on the project will be spent in the local economy. Second, these workers support local training and employment programs that have proven effective at improving employment opportunities in the region. Third, these workers are highly trained in safe, efficient and effective construction techniques, which will contribute to safe and timely project completion. For these reasons, CURE supports approval of the PDEF.

### **A. Wages and Benefits Will Be Spent Locally**

During evidentiary hearings, witnesses for Staff and CURE confirmed that a sufficient number of workers live within a one-hour commute of the PDEF project site to supply the project with its labor needs. These workers have roots in the local community and will spend their wages and benefits locally, to the benefit of the local economy.

In addition, CURE’s witness testified that PDEF has agreed to pay workers adequate wages and to contribute to multi-employer benefit programs. Adequate wages and benefits provide workers with the resources to maintain their roots in the community and to contribute positively to the local economy.

### **B. Training and Placement Programs Benefit the Local Economy**

CURE’s witness also presented testimony that the unions that will supply workers for the project support outreach, training and placement programs that have proven effective at enhancing employment opportunities for local residents. These programs will be supported by workers on the PDEF.

Each union employee on the PDEF will contribute up to \$0.85 an hour in wages to support local union training and apprenticeship programs. Union apprenticeship programs are open to any qualified applicant.

Apprenticeships vary from craft to craft, but generally require three to five years of on-the-job training and a minimum of 144 hours of classroom instruction per year. For the apprentice, this translates into an “industry scholarship” worth up to \$40,000 in some crafts.

Over the last several decades, union apprenticeship programs have demonstrated a high degree of success at training and maintaining a highly skilled workforce. In contrast, many non-union local apprenticeship programs have failed to graduate a single trainee over nearly a decade of enrollment. (See Exhibit 38.)

Union training efforts have also proven pivotal to the success of local efforts to improve job prospects for underemployed local residents. For example, under the City of Richmond’s First Source Agreement, the City obtained employment for over 460 local residents who participated in a union-sponsored training program. (See Feere Testimony at 6.) The City placed only 12 residents who did not receive union training. (*Id.*)

### **C. Training Programs Contribute to Safe, Accurate and Timely Plant Construction**

In addition to enhancing local employment opportunities, union training programs ensure that members are highly competent in their chosen field, familiar with the most efficient materials and techniques of their trade, and operate in a safe manner.

Technology changes rapidly in the construction industry, as it does in many sectors of the economy. The unions that will supply workers for the PDEF continually update their training programs and facilities to reflect changing technology. They offer journeyman upgrade and certification programs, as well as apprenticeship training, to keep members apprised of new developments in the industry. They also stress safety in all aspects of the trades, providing courses in such subjects as OSHA requirements, CPR and hazardous materials handling.

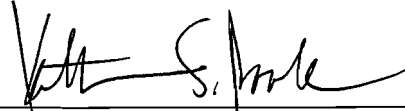
For the PDEF and the local community, these training programs mean that a highly-skilled workforce will contribute to completing the project in a safe and timely manner.

### III. CONCLUSION

Because of the socioeconomic benefits described above, CURE supports approval of this project.

Dated: May 7, 1999

Respectfully submitted,



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STATE OF CALIFORNIA

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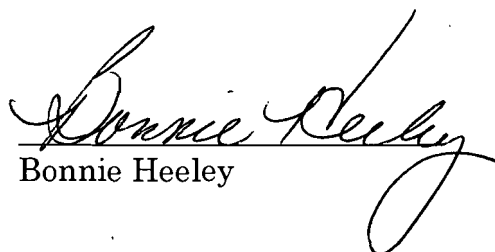
Application for Certification  
for the Pittsburg District Energy  
Facility (FDEF)

Docket No. 98-AFC-1

PROOF OF SERVICE

I, Bonnie Heeley, declare that on May 7, 1999, I deposited copies of the attached **Opening Brief of California Unions for Reliable Energy** in the United States mail in South San Francisco, California with first class postage thereon fully prepaid and addressed to all parties on the attached service list.

Dated at South San Francisco, California this 7th day of May, 1999. I declare under penalty of perjury that the foregoing is true and correct.

  
Bonnie Heeley

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