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**on Draft Ideal ZEV Workforce Pilot**

*Additional submitted attachment is included below.*



March 5th, 2021

California Energy Commission  
Docket Unit, 20-ALT-01  
1516 Ninth Street  
Sacramento, CA 95814-5512

VIA DOCKET

Energy Commission Docket 20-ALT-01

Re: Draft IDEAL ZEV Workforce Pilot

Dear Commissioners:

GRID Alternatives (GRID) respectfully submits the following comments in response to the Pre-Solicitation Workshop for the IDEAL ZEV Workforce Pilot held on February 26, 2021. GRID strongly supports the Commission's efforts to ensure that the expansion of zero-emission vehicles is coupled with robust workforce development programs. As a clean energy technology provider and a job training organization with a mission of making clean energy and workforce development opportunities accessible to under-resourced communities, we are pleased to offer input on this very important solicitation.

## **I. Workforce Development Best Practices Should be Considered in Application Evaluation**

GRID supports the proposed scoring criteria for the solicitation and would like to offer some input on additional best practices the Commission should consider in its evaluation of applications.

The [Low Income Solar Policy Guide](#) developed by GRID in collaboration with Vote Solar and the Center for Social Inclusion, highlights strategies for a successful clean energy workforce development program that extends naturally from solar energy to zero-emission vehicles and infrastructure. We recommend that the Commission take into consideration the following strategies when scoring applications for economic and environmental benefits:

- Outreach to community colleges, job training organizations, housing authorities, and other entities that serve lower-income individuals, people of color, and others who are underrepresented in the clean energy workforce
- Paid hands-on training opportunities with wrap around services

- Local hiring and targeted hiring of women, formerly incarcerated people, people of color, and other disadvantaged groups
- Robust tracking plans to collect data on race and ethnicity, income level, and job placement of training participants
- Industry partnerships to promote hiring post-training

The aforementioned list of strategies is not an exhaustive list, but practices that GRID has found to be successful in the design of workforce development programs throughout California and across the country over the last decade.

## **II. Entities with Multiple Independent Affiliates Should be Permitted to Submit Multiple Applications**

We anticipate some confusion around the proposed rule that applicants may only submit one application for organizations that have multiple affiliates. For example, GRID is a large non-profit organization headquartered in Oakland with regional affiliates that operate independently. Each of these affiliates are registered non-profit organizations with their own tax ID numbers. While these regional affiliates are part of the larger ecosystem of GRID and share its mission, they are autonomous and respond to the specific needs of each region in California. The staff in these offices have the expertise and experience to determine the appropriate level of funding and support needed for developing new programs in their region.

This is a common structure for many nonprofit organizations such as Habitat for Humanity. However, it is unclear whether these separate affiliates would be allowed to submit separate applications per the current proposed rule. For this reason, we recommend that the Commission clarify in the solicitation that applicants with separate tax IDs may submit separate applications, as a way of providing a clear definition for these nuanced situations.

Thank you for the opportunity to provide input on this exciting and much-needed equity program. We look forward to collaborating with the Commission to ensure that the growth of electric vehicles in the state is combined with comprehensive and accessible training programs.

Sincerely,

Zainab Badi  
Workforce Policy Project Manager  
GRID Alternatives