

**DOCKETED**

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*Comment Received From: Julia Sebastian  
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**Comments of Jobs with Justice San Francisco on the RFI RE  
Equitable Building Decarbonization Program**

*Additional submitted attachment is included below.*



13 January 2023

**California Energy Commission (CEC)  
Equitable Building Decarbonization Program  
Docket Number 22-DECARB-03**

On behalf of Jobs with Justice San Francisco, a long term alliance of labor and community organizations fighting for workers rights and racial justice in San Francisco and beyond, we respectfully submit the following comments on the Request for Information regarding the CEC Equitable Building Decarbonization Program.

Our coalition supports the state's investment and prioritization of an equitable building decarbonization program that aims to meet our collective goals of climate justice, high labor standards and critical benefits for historically divested community members. While the current design of the CEC's direct install and incentives program is generally aligned with the aforementioned goals, our coalition would like to provide the following comments in order to ensure that the program is maximally beneficial to workers and residents.

We echo and uplift the following high road labor standards, as outlined in the joint letter submitted by the Building and Construction Trades Councils of Alameda, Contra Costa and Napa and Solano Counties. These suggestions are considered fundamental industry standards in order to ensure that the public dollars allocated within this program create quality, family-sustaining jobs to local and disadvantaged workers.

**Labor Standards:**

- Require prevailing wages at every contracting tier
- Healthcare Portable and available to dependents and should meet Covered California's Silver Level
- Portable retirement benefits
- Participating in a State approved apprenticeship program that trains a skilled workforce
- Developing and/or augmenting existing pre-apprenticeship and apprenticeship programs to provide training in multiple emerging technologies, including heat pumps and hydronic systems.
- Attainment of industry appropriate certifications
- Regional targeted hire requirements to ensure the participation of disadvantaged workers and/or graduates from approved MC3 pre-apprenticeship programs
- A history of abidance with building code and labor laws
- Adopting a Multi-Craft Community Workforce Agreement or Project Labor Agreement negotiated with the Building Trades

We support the following equity principles, as outlined in the joint letter submitted by Building Decarbonization Coalition, California Environmental Justice Alliance and other environmental, health, and social justice organizations.

**General Equity Principles:**

- Meaningful community and CBO participation and engagement throughout program design and implementation
- Robust tenant protections and anti-displacement measures
- Support holistic home upgrades by leveraging existing health and energy programs where available, while not limiting programs to only communities with existing programs
- Prioritize households that currently lack or would particularly benefit from electrification programs, including renters, elders, disabled and those on a fixed income, shelters that house people experiencing homelessness and affordable housing.

**Direct Install Program:**

- Provide adequate time in DI program set up to Allow time to ensure robust feedback from CBOs
- Do not prescribe cost caps in the program guidelines
- Explore and include options for participants to work with the CPUC to develop bill protections
- Ensure automatic eligibility for residents participating in other low-income programs including but not limited to CARE and/or LIWP applicants to reduce administrative and participation burden
- Allow a portion of the DI program funding to demonstrate an ability to scale and serve multiple regions, as well as the capacity to continue providing holistic home upgrades throughout multiple regions beyond the subsidy period

**Incentives Program**

- Further heat pump market development by directing FY 22/23 incentive funds to the Multifamily Low-Income Weatherization Program (“LIWP MF Program”) or the TECH Program, rather than creating a new program.
- Streamline future year (FY 24-26) funding with the Inflation Reduction Act’s (IRA) HOMES and HEEHRA Programs, and with the new CEC Direct Install Program by providing guidance on layering incentives and prioritizing electrification especially to enable access to cooling.

Thank you for the opportunity to provide comment, and to echo the collective voice of the many community and labor organizations that have provided practical, effective and just suggestion for the betterment of this program for workers and community members throughout the state.

Sincerely,

**Julia Sebastian**

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