

**DOCKETED**

<b>Docket Number:</b>	23-DECARB-01
<b>Project Title:</b>	Inflation Reduction Act Residential Energy Rebate Programs
<b>TN #:</b>	251987
<b>Document Title:</b>	Efficiency First California Comments - Response to CEC's August 11, 2023 Request for Information
<b>Description:</b>	N/A
<b>Filer:</b>	System
<b>Organization:</b>	Efficiency First California
<b>Submitter Role:</b>	Public
<b>Submission Date:</b>	8/28/2023 2:38:37 PM
<b>Docketed Date:</b>	8/28/2023

*Comment Received From: Efficiency First California  
Submitted On: 8/28/2023  
Docket Number: 23-DECARB-01*

## **Response to CEC's August 11, 2023 Request for Information**

*Additional submitted attachment is included below.*



August 28, 2023

California Energy Commission  
Re: Docket No. 23-DECARB-01  
715 P Street  
Sacramento, CA 95814

Re: Response to the California Energy Commission's August 11, 2023 Request for Information Docket No. 23-DECARB-01

Dear Commissioners:

Efficiency First California (EFCA) appreciates the opportunity to respond to the California Energy Commission's (CEC) Request for Information regarding Contractor Training for Inflation Reduction Act Residential Energy Rebate Programs. EFCA's response to a portion of the questions requested follows:

Question 2: If IRA Contractor Training funds are used to supplement existing workforce development programs in California, which programs are most closely aligned with the goals of the IRA Contractor Training Program?

A range of organizations offer programs that are in alignment with the goals of the IRA Contractor Training Program. These include local, regional, and state governments, non-profit organizations, and utilities such as the Pacific Gas and Electric Company's Energy Centers. In particular, we highlight the programs in California's community colleges. Programs at Skyline College and the Construction Technology Program at Consumnes River College have a proven record of providing skilled training in building performance, HVAC and electrification. In the private sector, Revalue.io is an energy efficiency project developer based in Oakland, CA, successfully providing training to increase the local skilled workforce.

It is important that we learn from California's experience with the American Recovery and Reinvestment Act and apply supplemental funding in a way that ensures programs are sustainable after the supplement is exhausted.

Question 3: What gaps in existing workforce development programs in California can be addressed through the IRA Contractor Training Program? What is the current supply of qualified skilled energy efficiency workers compared to the projected future demand?

California's supply of qualified skilled energy efficiency workers falls short of the current and projected future workforce demand, especially for Heating, Ventilation, and Air Conditioning (HVAC) technicians and Electricians. The skilled trades have struggled to attract and train new employees for many years. The workforce shortage started in 2008



and has been an issue for most California contractors. The shortage is partially tied to training, as adult education courses have declined, and many relevant trade schools have closed due to a lack of funding.

Gaps in existing workforce development programs in California that could be addressed through the IRA Contractor Training Program funding include:

- Outreach to high school students: To increase uptake into this industry, we need to reach out to potential employees early in the workforce pipeline. We should outreach to high school students and promote the clean energy trades as an educational alternative to four-year colleges. The lack of skilled workers in this industry is partly due to the need for more knowledge and awareness about the opportunities in the clean energy industry. State programs like the Regional Occupational Centers might provide the infrastructure for this outreach and early training.
- Instructional delivery methods: To increase training program uptake and use program funds cost-effectively, we should be delivering training using the methods young workers prefer and are accustomed to. Instructional delivery methods have changed throughout the years, as have the younger generation's expectations of learning. Classroom and all-day training traditionally used in skilled trades workforce development need to transition to on-demand online educational offerings when allowable.
- Leveraging technology: To scale current knowledge in the industry and maximize the use of training funds, consider leveraging technology to allow experienced contractors to train and provide technical support to new workers. There are private sector examples of this model, including Bluo and MeasureQuick. These applications allowed technicians to communicate with experts remotely, stream data for analysis, and receive guidance on troubleshooting and fixing problems.
- Leveraging public-private partnerships: To fully leverage the state's training resources, we should work with our private sector partners. Particularly in the HVAC industry, manufacturers have been contributing to contractor training and education for a long time. We need to work with manufacturers to educate the workforce.
- Contractor use of energy efficient and electrification technologies: Contractors frequently do not have individual use of the technologies they're incentivized to install. Getting technologies like heat pumps into installers' homes will allow them to understand the strengths and weaknesses of the technology. This benefit for program participants could be funded through partnerships with manufacturers for equipment donations.



Question 4: What certifications should be funded through contractor training for residential energy rebate programs in California to support the purpose of this funding and lead to good-quality jobs?

More broadly related to the design of certification programs, funding should be directed to programs that train and certify participants who install energy efficiency and electrification projects. Too often in our industry, business owners or administrative professionals attend certification trainings and the knowledge gained from the certification is not transferred to the technicians in the field doing the work.

Funding of certification programs should also ensure that the certification isn't the final outcome of the program. If participants obtain certification to perform a specific task, such as Home Energy Rating System (HERS) raters, they should undergo regular quality control inspections and receive continuing education. We know of HERS raters who have rated projects for years and have never been subject to a field verification to confirm they meet performance standards.

Question 8: Input on other topics welcomed.

EFCA supports the state's efforts to emphasize intentional prioritization and consideration to serving its vulnerable and underserved communities with energy efficiency and electrification programs. This prioritization has significant implications for implementing these federal supplemental funds for workforce development programs.

Additional considerations for CEC's application for IRA Contractor Training Program funding: 1) Match the location of workforce development training and participants with the geographical need for workers. On-site workforce training should be close to the areas in the state prioritized for clean energy retrofits; 2) Use industry experts for training. We need credible and experienced instructors, and we need to verify their work to ensure they are effectively covering the approved content; 3) Structure training to be progressive, giving workers a defined pathway for advancement opportunities.

EFCA thanks the Commission for the opportunity to provide our comments. Please do not hesitate to contact me at (916) 384-0324 or [ccormany@efficiencyfirstca.org](mailto:ccormany@efficiencyfirstca.org) with any questions or further discussion you wish to have.

Sincerely,

Charles Cormany