

DOCKETED

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Contractor Training for IRA Residential Energy Rebate Programs

Additional submitted attachment is included below.

IN THE MATTER OF:

Inflation Reduction Act Residential Energy Rebate Programs

DOCKET NO. 23-DECARB-01 REQUEST FOR INFORMATION

RE: Contractor Training for Inflation

Reduction Act Residential Energy Rebate Programs

Request for Information Contractor Training for Inflation Reduction Act Residential Energy Rebate Programs

The County of Los Angeles, on behalf of the Southern California Regional Energy Network (SoCalREN) and the Los Angeles County Department of Economic Opportunity respectfully submit comments to the California Energy Commission in response to its Request for Information to inform its application to the U.S. Department of Energy for contractor training for residential energy rebate programs. Our comments reflect a long history of engagement in the workforce training sector, and we are hopeful that new opportunities for workers and contractors will arise from this inquiry and subsequent funding availability in order to ensure a robust clean energy workforce.

We provide the following comments in response to questions posed:

- 1. Question: Please provide information on available state and federal residential energy contractor training. Include: a) Residential (single-family and multifamily) and commercial energy auditor availability and readiness; b. Available skills assessment reports for existing education and training programs, such as on new energy technologies, latest best practices, or newly launching programs.**

Answer: The SoCalREN Workforce Education and Training program, which is funded largely through the California Public Utilities Commission with ratepayer dollars, serves as a model as it creates a labor/worker pipeline and contractor training to meet the supply and demand in energy efficiency while strengthening the number and diversity of skilled workers and contractors at all levels within the clean energy industry.

The Department of Economic Opportunity (DEO) delivers equitable workforce services that serve job-seekers and businesses in order to grow, succeed, and thrive in L.A. County. Through the County of Los Angeles America's Job Centers of California, DEO promotes economic mobility and business development and helps implement strategies to achieve equitable community development. This catalyzes employment opportunities for communities in need of an equitable economic recovery to reduce economic hardships and improve long-term outcomes both intergenerationally and multi-generationally.

SoCalREN focuses its recruitment of contractors and employees in disadvantaged communities throughout the Southern California region, offering no-cost training and

coaching, and supporting small, women, minority, disabled, veteran owned contractors with bidding on multi-family sector contracting opportunities. Non-certification-based contractor trainings include, for example: labor compliance and working with labor unions, heat pumps in retrofit construction, construction estimating and bid preparation courses. In addition, the County's business preference programs encourage business owners who are minorities, women, disadvantaged or disabled veterans to obtain [certification](#) that allows them to capitalize on opportunities in government and private-sector procurement programs.

2. **Question: 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?**

Program Goal #1: Reduce the cost of training contractor employees by providing workforce development tools for contractors, their employees, and individuals including, but not limited to, subsidizing available training, testing, and certifications.

Answer. The US Energy Commission goal to reduce costs for contractor training reflects the fact that many small contractors owned by people from traditionally marginalized communities may not have the resource—both time and financial—to take courses and subsequent exams that make them competitive for public and private sector projects. SoCalREN programming strengthens the Energy Efficiency/Clean Energy workforce and small business ecosystems, and it increases the number of skilled workers and businesses in the energy efficiency sector by offering training and coaching services free of cost to contractors and prospective workers. Furthermore, trainings that are offered virtually ensure accessibility to contractors from diverse regions who cannot take time out to drive to classes. We therefore recommend courses that are virtual when feasible and when hands-on training is not required, and low or free of cost.

Program goal #2: Provide testing and certifications of contractors trained and educated to install home energy efficiency and electrification technologies and deliver residential energy efficiency and electrification improvements.

Answer: In addition to standard certifications for contractors to prepare them for energy efficiency work, we recommend that course work include modules that reinforce consumer protection, promote contractor high standards and ethical behavior, and that enhance contractor skills to increase their credibility and long-term marketability. These courses not only help set the contractor up for success, but they remind participating contractors of government standards and expectations.

Program Goal #3: Partner with nonprofit organizations to develop and implement a state-sponsored workforce program that attracts and trains a diverse set of local workers to deliver the influx of new federally-funded energy efficiency and electrification programs—including but not limited to the IRA-funded Home Energy Rebate programs (IRA Sections 50121 and 50122).[3](#)

Answer: States have historically successfully run certification programs in partnership with non-profits that set standards for green energy projects, such as the Electric Vehicle Infrastructure Deployment Plans (EVIDPs). Resources for workforce development, including contractor training and certification, can set high standards for skills development and eligibility for projects. While state funded, however, we recommend that plans are administered locally or regionally where unique strengths and needs are recognized and honored.

3. Question: 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?

Answer: in order to meet demand for a robust energy efficiency and clean energy workforce, including contractors with the skills, knowledge and licensing capability to compete for green energy jobs, we may consider encouraging and incentivizing unlicensed contractors to become licensed. Recruitment of unlicensed contractors, many of whom do not pursue a license because of the barriers to entry, including high costs, language barriers, educational (book learning), could increase the supply of highly skilled workers and boost the standard of living for contractors who work under the table. Incentives might include waiving fees, providing language appropriate coaching, and free exam preparation courses.

4. Question: 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? As stated in the guidance from the U.S. Department of Energy on this topic: **4 good-quality jobs are jobs that pay sustaining wages with wage progression, benefits, access to paid leave, opportunities for career advancement through training and education, adequate staffing, safety and health protections, nondiscriminatory and harassment-free workplaces that promote Diversity, Equity, Inclusion, and Accessibility (DEIA) and, to the strongest extent possible, a platform for worker voice that supports all workers and ensures fair pay and safe working conditions.**

Answer: As a local government administrator of clean energy programs, SoCalREN strongly agrees and supports not only the guidance of the US DOE but also state and local ordinances that require living wage and certification for contractors. SoCalREN has found that setting requirements such as these not only helps contractors to support their employees but also ensures bad actors do not function within these programs. However, many contractors, specifically small WMDVBES, cannot often support the cost of certifications required. Thus, at a minimum, any contractor training should include resources that assist certifying contractors and their employees. SoCalREN recommends at the minimum the DOE's Home Energy Professional credentials which include the Energy Auditor (EA) and Quality Control Inspector (QCI) certifications, the Retrofit Installer Badges, and the Crew Leader job task analysis (JTA). The EA and QCI

require experienced home energy professionals to demonstrate comprehensive knowledge, practical skills, and technical proficiency to earn the certification. The Retrofit Installer Badges provide a flexible, customizable, and voluntary approach to training and skills recognition for WAP implementers, utility programs, private-sector workers, and contractors.

- 7. Question: In the Community Benefits Plan required as part of the CEC application for DOE funding for contractor training for IRA residential energy rebate programs, how should the program ensure the delivery of measurable community and jobs benefits, and: 1) support meaningful community and labor engagement; (2) invest in America's workforce; (3) advance diversity, equity, inclusion, and accessibility; and (4) contribute to President Biden's goal that 40 percent of the overall benefits from certain federal investments flow to disadvantaged communities under the Justice40 Initiative.**

Answer: In order to meet the projected demand for qualified skilled energy efficiency workers, we recommend that the CEC seek funding to expand the technical, financial, and organizational capacity of small and disadvantaged contractors to acquire and perform EE projects. We believe one way to strengthen jobs and business opportunities for disadvantaged communities is by establishing regional Clean Energy HUBS (virtual and physical) as resource centers that connect/network workers and contractors to on-going information, resources, training, jobs, and project opportunities. We also recommend that the CEC increase building operational efficiencies through a capacity building program and a regional energy management training program. One model to emulate might be the State of California's High Road Training Partnership (H RTP) model, a leading practice in workforce development that calls for an increase in designated pathways where workers are trained for jobs with family sustaining wages. H RTPs bring together industry, education and training providers, labor, and community to build employer-informed, skill-based training models that meet evolving market needs and promote job quality, equity, and sustainability. The H RTP model also promotes equity and shared prosperity through an inclusive human capital strategy that prioritizes job quality; and links worker-centered, regionally based industry strategies to a statewide skills agenda. The LA County Department of Economic Opportunity is in the process of developing H RTP workforce programs in green energy, green transportation, electrification, water and wastewater management and just transition.

And finally, given that training and competency for green energy jobs takes many years and that young people from disadvantaged communities have fewer opportunities for education and training, we recommend the establishment of a fully funded apprenticeship program for high school age students from low-income communities. Key to the success of job training programs is placement in credible, stable institutions. One idea might be to agree to waive fees associated with annual licensing if a contracting firm agrees to provide paid apprenticeship opportunities to two or more students per year. A program that cultivates and trains workers, ensures that these workers are from communities with traditionally fewer opportunities, and that incentivizes contractor participation will strengthen the worker-employer pipeline.