

DOCKETED

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**Rising Sun Center for Opportunity Comments on the CEC 2024
Building Energy Action Plan**

Additional submitted attachment is included below.



March 26, 2024

California Energy Commission
Dockets Office, MS-4
Re: Docket No. 23-DECARB-03
1516 Ninth Street
Sacramento, CA 95814-5512

Via Electronic Commenting System

Re: Docket No. 23-DECARB-03; Comments of Rising Sun Center for Opportunity, on the California Energy Commission 2024 Building Energy Action Plan

Rising Sun Center for Opportunity respectfully submits our comments in response to the California Energy Commission (CEC)'s 2024 Building Energy Action Plan. Our comments focus on workforce and job quality considerations to help strengthen the Plan.

Background and Introduction

Previous climate investments in the U.S. have often failed to create jobs that offer livable and dignified wages, employer-provided benefits, and opportunities for career advancement. Decarbonizing the residential building stock will lean on the existing residential construction industry. Compared to the commercial, industrial, and new construction sectors, residential retrofit construction occupations often offer lower wages, fewer worker benefits, low union density and worker organizing, safety violations, and lack of enforcement. A large proportion of work occurs under the table. Without intentional action, leveraging this industry to decarbonize our existing building stock will perpetuate these conditions and lead to decarbonization work occurring at the expense of workers, as well as undermining the quality of work provided to communities. Public climate investments to decarbonize residential buildings offer an opportunity to intervene and uplift this industry while pursuing our climate goals.

We envision a residential building decarbonization industry that supports equitable access to quality jobs, attracts a qualified workforce, and provides stable career pathways for disadvantaged workers while reducing greenhouse gas emissions and building more resilient communities. We appreciate the CEC's inclusion of workforce considerations in prior editions of the Action Plan, including reference to quality jobs on p. 75 of the 2021 Plan. We see these strategies as critical not only for the sake of the workers, but to develop a robust workforce and contractor network that can rapidly and seamlessly meet the decarbonization needs of our state climate goals through enhancing worker and contractor recruitment and retention in this sector. We recommend the following items to further articulate this goal in the plan:

Recommendations

1. **Leverage the [High RoadSM Climate Agency Partnership](#)** - As the CEC is a member of this partnership body, we highly encourage the 2024 Building Energy Action Plan team to consult the expertise of this interagency working body to identify how to integrate high road principles into the design of the 2024 Plan.
2. **Partner with the CEC's TREC initiatives** to invest in solutions that meet workforce and contractor gaps and barriers. In our experience, current workforce pipelines are not moving job seekers towards residential construction, as these positions do not provide high quality job opportunities. Elevating the standards of these jobs and then orienting existing building trades training pathways accordingly will help build a robust, skilled worker pipeline. Workforce training should prioritize programs and pathways such as pre-apprenticeships that provide training, career services, case management (removing individual barriers, referrals, housing, and so forth), wrap-around services (such as stipends, mental health care, and trauma-informed care), and job placement support.
3. **Recommend applicable labor standards** for publicly subsidized decarbonization programs serving the residential retrofit sector: work to achieve our building decarbonization goals must provide family-sustaining wages, benefits, career advancement, a voice for the worker, safety, and accessibility. The design of incentive programs should integrate standards to require and support current and aspiring high road contractors to meet these standards. The [Residential Decarbonization High Road Training Partnership](#) (H RTP), facilitated by [Rising Sun Center for Opportunity](#) and the [Construction Trades Workforce Initiative](#), is in the process of developing a set of recommended industry labor standards that cover the following categories:
 - a. Regional and Targeted Hire Standards,
 - b. Fair Wages and Benefits,
 - c. Training and Certification, and
 - d. Compliance and Accountability.

Setting labor standards helps level the playing field for high road contractors to compete, uplifting those who are providing quality jobs and supporting contractors who do not yet meet those benchmarks. Recommending a statewide labor standards approach for all building decarbonization efforts will help streamline contractor participation requirements across programs, making it easier to engage and stack multiple programs. These standards are still in the draft process, but our Partnership would be happy to discuss these further with the CEC.
4. **Research supports for small, local, and minority contractors** - Complement labor standards with supports for small, minority contractors to effectively meet these standards. This can include technical assistance, administrative support for engaging with program paperwork/materials/requirements, leveraging one-stop-shop models, cash flow financing, tools for project pipeline management, and more. For small contractors, in contrast to larger contractors, it can be difficult to bring on full-time employees and invest in high road job elements such as health benefits for employees when they do not have a long term project outlook. These resources can help address this issue. Partner with contractor associations as well as organizations that support contractor development, such as Emerald Cities Collaborative, to identify best practices and provide supportive services to contractors. For more detailed comments on best practices for contractor education and involving small/minority contractors, refer to the Bay Area Residential Decarbonization H RTP's [comments in response to the TREC RFI](#).

- i. **Aggregation and zonal decarbonization as a high road job quality strategy** - We recommend articulating aggregation and zonal decarbonization as high road strategies, as these methods help build a strong project pipeline and engage skilled trades. We ask that the CEC provide additional guidance on best practices to actualize aggregation. We recommend language found in the City of Berkeley Just Transition Pilot RFP: “Aggregated Project(s) Development: In consultation with the City and community partners, develop aggregated project(s) including: income eligibility criteria, proposed scope of work and estimated budget per unit, workforce needs and capacity based on proposed work, and outreach to recruit participating owners, residents and contractors.”¹ Consult with the Building Decarbonization Coalition on strategies and benefits of zonal decarbonization.
5. **Identify overlapping efforts and form partnerships** - There are many overlapping initiatives in this arena currently. Articulating a need to partner with and coordinate between complementary programs will help move these programs in a coordinated fashion and deepen the impact of each of these individual initiatives.

Rising Sun appreciates the CEC for its commitment to uplifting the decarbonization workforce and for the opportunity to comment and engage in this process. We welcome future conversations, as useful and appropriate, to explore the topic of workforce and job quality standards more in-depth.

¹https://berkeleyca.gov/sites/default/files/documents/23-11586-C_Berkeley%20Just%20Transition%20Residential%20Electrification%20Pilot%20Program.pdf