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*Comment Received From: Rising Sun Center for Opportunity  
Submitted On: 3/29/2024  
Docket Number: 22-DECARB-03*

**Rising Sun Center for Opportunity Comments on the CEC EBD Pre-Solicitation Materials**

*Additional submitted attachment is included below.*



March 29, 2024

California Energy Commission  
Re: Docket No. 22-DECARB-03  
1516 Ninth Street  
Sacramento, CA 95814-5512

Via Electronic Commenting System

**Re: Docket No. 22-DECARB-03; Comments of Support from Rising Sun Center for Opportunity on the California Energy Commission Equitable Building Decarbonization Pre-Solicitation Materials**

Rising Sun Center for Opportunity, the facilitator of the Bay Area High Road Training Partnership (H RTP), is a nonprofit workforce development organization focused on equity, climate, and good jobs in the greater Bay Area and Stockton. We respectfully submit our comments in response to the California Energy Commission (CEC)'s Equitable Building Decarbonization (EBD) Pre-Solicitation Materials. Our comments are in support of the outlined requirements included in the EBD Pre-Solicitation documents (Manual, Scope of Work, State Terms and Conditions, and Federal Terms and Conditions).

**Background and Introduction**

Rising Sun builds career pathways for economic equity and climate resilience through workforce training and employment programs. Our programs help people train for, secure, and succeed in climate and infrastructure jobs, and we have decades of experience implementing direct install energy efficiency programs in priority communities through our youth employment program. Since 2021, Rising Sun has facilitated a High Road Training Partnership ([H RTP](#)) in the Bay Area designed to improve the quality of jobs in the residential decarbonization sector. H RTPs are regional, industry-based, worker-focused partnerships supported by the CA Workforce Development Board that address critical issues of equity, job quality, worker voice, and environmental sustainability and build skills for California's high road employers. Our Partnership, co-led by regional labor representatives, convenes Bay Area cities and government agencies, unions, employers, workers, and equity advisors. The vision of the Partnership is to develop 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 simultaneously reducing greenhouse gas emissions and building more resilient communities.

Rising Sun, as the facilitator of this Partnership, commends the CEC for taking into consideration the calls from environmental justice, labor, and workforce entities to include: the payment of prevailing wages applying to all contractors and subcontractors, the prohibition of discriminating employment decisions from contractors and subcontractors, the Greenhouse Gas Fund Requirements Reporting, and the continued dedication to uplifting job quality within the residential construction workforce. We recognize

the CEC's intentional efforts to learn from community and practitioner knowledge. These will have the impact of ensuring that California's climate investments create high quality jobs. We propose a recommendation to further strengthen the job quality measures included in these pre-solicitation materials as follows:

**Recommendation**

**Strengthen and Clarify this Clause** from the Draft Equitable Building Decarbonization Direct Install Solicitation Manual: "Projects that receive an award of public funds from the CEC often involve construction, alteration, demolition, installation, repair, or maintenance work over \$1,000. For this reason, projects that receive an award of public funds from the CEC are likely to be considered public works under the California Labor Code". We propose clarifying this clause to clearly state that Contractors and their subs who receive over \$1,000 of public funding through the CEC Equitable Building Decarbonization program shall be subject to prevailing wage requirements. This will have the effect of clarifying that the \$1,000 threshold applies to program funding rather than individual residential projects. Without this clarification Contractors may have a perverse incentive to provide services limited to less than \$1k per household to evade prevailing wage requirements, and jobs created therefore will not be high quality, as intended by the program guidelines. For a potential rewrite of this clause, we propose, "Contractors and their subs that receive an award of public funds from the CEC Equitable Building Decarbonization program over \$1,000 that involves construction, alteration, demolition, installation, repair, or maintenance work are considered public works projects under the California Labor Code."

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. Thank you for your consideration.

Sincerely,



Julia Hatton  
President & CEO  
Rising Sun Center for Opportunity