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Submission Via Docket No. 22-DECARB-03

California Energy Commission
Docket Unit, MS-4
Docket No. 22-DECARB-03
715 P Street
Sacramento, California 95814

Re: **Comments of the Labor Coalition on the Draft Solicitation for Three Regional Administrators for the Equitable Building Decarbonization Direct Install Program**

Dear Commissioners and Staff:

We write on behalf of the Joint Committee on Energy and Environmental Policy, Western States Council of Sheet Metal, Air, Rail and Transportation Workers, California State Pipe Trades Council, and the International Brotherhood of Electrical Workers-National Electrical Contractors Association Labor Management Cooperation Committee (collectively “the Labor Coalition”) in support of the Draft Solicitation for three regional administrators for the Equitable Building Decarbonization Direct Install Program.¹

The Direct Install Program will install retrofit measures in low-income households in single-family, multifamily, and manufactured homes in underresourced communities to reduce greenhouse gas emission from existing buildings and advance energy equity.² California has allocated nearly \$690 million

¹ TN 254967-1, California Energy Commission, Draft Equitable Building Decarbonization Program Direct Install Solicitation Manual (Mar. 2024), *available at* <https://efiling.energy.ca.gov/GetDocument.aspx?tn=254967-1>.

² TN 252682, California Energy Commission, Program Guidelines: Equitable Building Decarbonization Direct Install Program Guidelines (Oct. 2023) p. 3 (hereinafter “Direct Install Program Guidelines”), *available at* <https://efiling.energy.ca.gov/GetDocument.aspx?tn=252682&DocumentContentId=87762>.

in state funding to the Direct Install Program.³ Additional federal funding from the Department of Energy’s Home Efficiency Rebates (“HOMES”) Program may also be integrated into the Direct Install Program.⁴ Given these significant investments toward California’s decarbonization efforts, it is essential that this program be effectively implemented, including the development and execution of a workforce plan which ensures high-quality installations and creation of local, high-quality jobs in the communities served.⁵

In coordination with the Commission, the Direct Install Program will be administered by three competitively selected regional administrators in Northern, Central, and Southern California. On March 11, 2024, the Commission released the Draft Solicitation, including drafts of the manual, scope of work, state terms and conditions, and federal terms and conditions. The Commission then held a workshop on March 14, 2024 seeking input on the draft solicitation materials.

Overall, the Labor Coalition supports the Draft Solicitation. To ensure the workforce standards and requirements are consistent with the Program Guidelines and clearly articulated to potential administrators, the Labor Coalition recommends the following modifications and additions to Task 5.3 of the scope of work:⁶

- **Required Qualifications. Recipient’s plan to establish minimum **training and experience** qualifications **for construction workers, including hands-on training to install eligible equipment and appliances**, consistent with the Workforce Standards and Requirement section of the Guidelines and HOMES Program Requirements and Application Instructions Section 3.2.5, **and method for evaluating whether a contractor complies the minimum qualifications.****
- **Priority Periods. Recipient’s plan for establishing an initial priority period for each funding round which limits applications and awards to contractors who meet three of the six criteria established in the Workforce Standards and Requirements section of the Guidelines.**

³ *Id.* at p. 4.

⁴ TN 255186, California Energy Commission, Presentation for Equitable Building Decarbonization Program Pre-Solicitation Workshop (Mar. 20, 2024) p. 14, *available at* <https://efiling.energy.ca.gov/GetDocument.aspx?tn=255186&DocumentContentId=90870>.

⁵ Direct Install Program Guidelines at pp. 28-29.

⁶ TN254967-2, California Energy Commission, Draft Equitable Building Decarbonization Direct Install Solicitation Scope of Work (Mar. 2024) pp. 16-17, *available at* <https://efiling.energy.ca.gov/GetDocument.aspx?tn=254967-2>.

- **Measure Results. Recipient's plan to measure the results of the Workforce Plan, including how the Workforce Plan achieved the goal of ensuring high-quality installations and creating local, high-quality jobs in the communities served, and identification of any qualitative or quantitative metrics.**

Effective implementation of the Program Guidelines' workforce standards and requirements will ensure that this program attracts high road contractors, achieves maximum energy savings for customers, ensures safe installation, creates good paying career-path jobs with benefits and training, and creates a clear, established path for disadvantages workers to enter good-paying, construction careers. We greatly appreciate Staff's engagement with stakeholders to develop the most effective program possible. We look forward to assisting with implementation of the program to ensure it achieves its goals of reducing greenhouse gas emissions and advancing energy equity.

Thank you for your consideration of these comments.

Sincerely,



Thomas A. Enslow
Andrew J. Graf

AJG:acp