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Comments of Brightline Defense Project on the Draft Staff Report

Additional submitted attachment is included below.



March 16, 2018

California Energy Commission
Docket Office, MS-4
1516 Ninth Street
Sacramento, CA 95814

Via email

Re: Docket No. 18-IEPR-08

**COMMENTS OF BRIGHTLINE DEFENSE PROJECT ON THE DRAFT STAFF
REPORT: TRACKING PROGRESS FOR ENERGY EQUITY**

I. Introduction.

Brightline Defense Project (“Brightline”) is a policy advocacy nonprofit that works to empower communities and create sustainable environments, particularly in improving workforce development efforts and building green assets for communities in need. Since 2016, Brightline has engaged with the California Energy Commission’s (“Commission”) implementation of Senate Bill 350. Brightline’s comments on the SB 350 Low-Income Barriers Study highlighted the need to develop workforce programs that focus on career pathways, so that low-income and disadvantaged communities can receive both the energy savings and economic benefits associated with energy efficiency and renewable energy programs (“EE and renewable programs”).¹ Brightline submits the following comments on the Draft Staff Report: Tracking

¹ Brightline’s Comments on SB 350 Barriers Study Draft Report, Docket No. 16-OIR-02, TN # 213855.

Progress for Energy Equity (Draft Report) to assist the Commission’s efforts to implement the recommendations in the SB 350 Low-Income Barriers Study.

II. California Low-Income Areas.

According to the Draft Report, targeting areas “at or below 60 percent of statewide median income” will include areas that meet the income eligibility requirements for other clean energy programs serving low-income customers.² Brightline suggests the Commission follow the approach taken by the California Department of Community Services & Development (CSD). The Low-Income Weatherization Program, administered by CSD, serves customers who either meet income qualifications of 60 percent of the state median income or the income requirement for the California Solar Initiative’s Single-Family Affordable Solar Homes program, which utilizes 80 percent of the area median income.³ This approach is more expansive and allows for factors such as cost of living to be taken into consideration. Therefore, Brightline suggests the Commission use this approach.

III. Clean Jobs.

As the Draft Report points out, jobs in EE and renewable programs are needed for residents of low-income and disadvantaged communities. Brightline agrees that data on the quality of jobs in the clean jobs sector is needed but believes that the Commission should track additional data.⁴ The Commission should also collect data on the workforce itself to ensure that jobs in clean energy have racial and gender diversity. Data on the longevity of jobs is also needed to ensure that employees who obtain work in the clean job sector obtain long-term employment. The Draft Report also points out that information from the workforce, education,

² Draft Report, at 7.

³ <http://www.csd.ca.gov/Portals/0/Documents/Fact%20Sheets/LIWP%20Fact%20Sheet%2003.25.2016.pdf>; <http://www.cpuc.ca.gov/WorkArea/DownloadAsset.aspx?id=4585>, at 7.

⁴ Draft Report, at 30.

and training programs administered by the Investor Owned Utilities (IOUs) will help identify opportunities to strengthen workforce opportunities.⁵ The Commission should require the IOUs to also provide data on job placement resulting from the training programs.

Brightline also urges the Commission to collaborate with the California Public Utilities Commission (CPUC) so that the two agencies may set similar workforce policies. The Commission recently adopted the Solar On Multifamily Affordable Housing (SOMAH) program, which includes a workforce development component. The SOMAH program set a job training requirement so that contractors provide a pathway for low-income residents to obtain the necessary skills to join the green sector, set data tracking requirements, and provided the program administrator, yet to be selected, with the authority to set a local hiring requirement.⁶ The Draft Report notes that many counties have a low number of clean jobs when compared to their respective populations, which “suggests a need for local hiring”⁷ The Commission should work with the CPUC to set an interagency local hiring policy for energy programs.

IV. Small Business Contracts.

The Draft Report notes that “the Barriers Study called for further study to determine actions for increasing contracting opportunities for small businesses in low-income and disadvantaged communities.”⁸ This study should include data on what percent of small businesses are minority and women owned. This will allow the Commission to develop strategies, as needed, to promote gender and racial diversity in ownership.

V. Conclusion.

⁵ Draft Report, at 30-31.

⁶ CITE.

⁷ Draft Report, at 29.

⁸ Draft Report, at 32.

Brightline thanks the California Energy Commission for the opportunity to provide comments on this important matter and for its commitment to improving access to energy efficiency and renewable energy programs for low-income communities. Brightline looks forward to continuing to engage with the Commission on this important matter.

Sincerely,

/s/ Eddie H. Ahn
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