

DOCKETED

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*Comment Received From: Jordan Ackerman
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Re Docket No 23-DECARB-01; Comments of Construction Trades Workforce Initiative on Contractor Training for IRA Rebate Program

Additional submitted attachment is included below.



North Bay
Building Trades
 Council AFL-CIO #BuildtRightWithUs
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August 28, 2023

California Energy Commission
 Docket Unit, MS-4
 Docket No. 23-DECARB-01
 715 P Street
 Sacramento, California 95814

Via Electronic Commenting System

Re: Comments of Construction Trades Workforce Initiative on Contractor Training for Inflation Reduction Act Residential Energy Rebate Programs

The Building and Construction Trades Councils from all (8) Bay Area counties and the Construction Trades Workforce Initiative (CTWI) respectfully submit our comments in response to the California Energy Commission (CEC) Contractor Training for Inflation Reduction Act Residential Energy Rebate Programs. We want to highlight the union model as the standard for where and how investments should be made.

CTWI is the nonprofit partner of the East Bay Building Trades, working to ensure the long-term sustainability of the construction industry by bridging the gap between union construction labor and key stakeholders. The Building and Construction Trades Councils represent 150,000 workers in the Bay Area spanning all aspects of construction and their members take great pride in building their communities and delivering projects that enhance our cities and at the same time usher in a new generation of workers. Together, CTWI and the Building and Construction Trades Councils act as the collective voice of Bay Area construction trade labor.

We support the CEC's investments in supporting decarbonization and training to facilitate these efforts both for contractors and for workers. We understand this specific program is focused primarily on contractor training, but we want to place a particular emphasis on leveraging these funds in a way that also trains and benefits workers. 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 advancement. Given the challenging nature of the residential construction sector, this is likely to happen again without strategic policy intervention and coordination.

Contractors who are union signatory make investments in their workers as part of their Master Labor Agreements (MLAs) and Collective Bargaining Agreements (CBAs). It is built into their model that any investment in training contractors also serves to train and benefit the workers as well. These contractors engage with their workers through Joint Labor Management Partnerships, whereby contractors (management) work with their employees (labor) to develop training programs. Joint Apprenticeship Training Committees (JATCs) develop training curriculum that meets industry needs and safety standards.

We would like to further highlight the specific training institutions, programs, and certifications that unions provide in their union apprenticeship programs and that union signatory contractors provide through continuous career training for their workers. These training institutions, programs, and certifications include the following:

- Joint Apprenticeship Training Committees (JATCs)
- Buildings and Construction Trades Contractors Associations
- International Certification Board (ICB) Certifications
- Testing, Adjusting, and Balancing Bureau (TABB) Certifications

Another key piece of the puzzle is pre-apprentice training, which when provided to targeted communities is an important pathway into high road employment for women, minorities, residents of low-income communities, justice impacted individuals and veterans. Pre-apprenticeship training is not self-funding, and so needs public funding to make it work. Also, unlike apprentices, pre-apprentice students aren't earning while they learn, so provision of stipends can be important to enable more disadvantaged workers to participate. For pre-apprentice students with custodial care responsibilities, funding for childcare is also a critical need.

For training aimed at the employer regarding management, sales or other non-construction tasks, there are gaps in available services. This is particularly a challenge for women and minority owned businesses. Providing resources for their training is important too, but this should be distinct from the construction related training.

We would like to acknowledge and lift up the comments being submitted by our partners at the Western States Council of SMART. Western States Council of SMART has highlighted in their own comments the invaluable training and certification that Sheet Metal Workers (SMW) unions provide to their contractors, apprentices, and workers that include and go beyond the programs identified above. SMW demonstrates an exemplary training model that benefits both their signatory contractors and workers, and the CEC should look towards the comments Western States Council of SMART have submitted for guidance on where to allocate these important investments for the highest quality impact.

We would also like to note that CTWI is a co-leader of the Bay Area High Road Training Partnerships (HRTP) alongside the Rising Sun Center for Opportunity. HRTP is a California initiative designed to model partnership strategies that transform industries across the state from low road to high road - generating family sustaining jobs where workers have agency and voice, all while supporting broader climate sustainability efforts. We would like to also acknowledge and lift up the comments being submitted by the collective HRTP partnership under Rising Sun's stewardship to which we have signed on in support. It is critical we approach our climate sustainability and decarbonization initiatives in a model of cooperation and partnership and we support the collective advocacy for training investments put forth by the HRTP.

Lastly, we would like to advocate for the inclusion of Labor Standards in any program development as a way to ensure that the quality, high road jobs are produced. Where applicable, this program should include the following Labor Standards:

- Require prevailing wages at every contracting tier
- Healthcare Portable and available to dependents and should meet Covered California's Silver Level
- Portable retirement benefits
- Participating in a State approved apprenticeship program that trains a skilled workforce
- Attainment of industry appropriate certifications
- Regional targeted hire requirements to ensure the participation of disadvantaged workers and/or graduates from approved MC3 pre-apprenticeship programs
- A history of abidance with building code and labor laws
- Adopting a Multi-Craft Community Workforce Agreement or Project Labor Agreement negotiated with the Building Trades

We appreciate the CEC for its commitment towards investment in climate sustainability and the training necessary to ensure successful decarbonization efforts for both contractors and workers. We appreciate the opportunity to offer comments and engage in this process. We welcome future conversations, as useful and appropriate, to explore the topic of workforce and contractor training and standards more in-depth.

Respectfully,

Andreas Cluver

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