

DOCKETED

| | |
|-------------------------|--|
| Docket Number: | 23-ERDD-01 |
| Project Title: | Electric Program Investment Charge (EPIC) |
| TN #: | 259454 |
| Document Title: | IBEW 569 Comments - California Battery Pilot Manufacturing Line Comments |
| Description: | N/A |
| Filer: | System |
| Organization: | IBEW 569 |
| Submitter Role: | Other Interested Person |
| Submission Date: | 10/4/2024 2:08:43 PM |
| Docketed Date: | 10/4/2024 |

*Comment Received From: IBEW 569
Submitted On: 10/4/2024
Docket Number: 23-ERDD-01*

**California Battery Pilot Manufacturing Line Comments - Docket NO
23-ERDD-01**

Additional submitted attachment is included below.



IBEW 569

October 4, 2024

Hon. Chair Hochschild, Vice Chair Gunda, and Commissioners Gallardo, McAllister, and Monahan
California Energy Commission
715 P Street
Sacramento, CA 95814

RE: California Battery Pilot Manufacturing Line Concept - Docket NO. 23-ERDD-01

Dear Honorable Chair Hochschild and Commissioners,

On behalf of IBEW 569, representing 3,700 union electricians and power professionals in the San Diego and Imperial Counties, we are thrilled that the State is proactively thinking about ways in which California can be a leader in the battery manufacturing industry with the goal of meeting its clean energy goals by 2045.¹ We wish to suggest scoring components to incorporate into the forthcoming competitive solicitation for the California Battery Pilot Manufacturing Line. These priorities will ensure the solicitation is optimized for workforce training in green, high-road jobs in those communities that will benefit most, while developing a training curriculum that will have lasting impact on California's emerging clean, green workforce.

IBEW 569 has been part of the Imperial Valley community for over 20 years. We have trained Imperial Valley residents for high-road jobs in the electrical industry through our Imperial Valley joint labor-management apprenticeship program and negotiated community benefit agreements in the direct lithium extraction industry to ensure resources and opportunities remain in our communities. IBEW 569 recognizes that the Salton Sea Known Geothermal Resource Area (KGRA) can produce about 600,000 metric tons of lithium carbonate per year. This region's production potential is estimated to exceed global lithium demand as of 2021. "Lithium Valley" has the potential to be home to industries like electrical vehicles, battery storage, and battery manufacturing. Direct lithium extraction in this region will help California

¹ California Governor's Office of Business and Economic Development, "Climate and Energy Goals," *CA.gov*, accessed 30 September 2024, <https://business.ca.gov/industries/climate-and-clean-energy/>.

reach its climate and sustainability goals. IBEW 569’s experience in this region and in the battery energy storage system industry informs our recommendations.

Applications that include the following elements should be given a greater scoring potential than applications that do not include these elements.

1. Facility built under a Project Labor Agreement.

- Grant proposals that commit to constructing the 30,000 sq. ft. facility under a Project Labor Agreement (PLA) should be scored higher. PLAs will ensure the construction of the facility will be done on time and on budget. Additionally, a PLA can serve the local community by including a local hire provision, thereby creating more local high-road jobs, expanding registered apprenticeship opportunities, and benefiting the local community where the facility will be sited.
- With record investments in the clean energy economy – such as the Inflation Reduction Act – PLAs are federally recognized as a “best practice.” Indeed, they are encouraged by US departments like the US Treasury and the Department of Labor.²

2. Locating the facility in a region designated as a Disadvantaged Community per SB 535 (De Leon, 2012).³

- Grant applications that plan to site the 30,000 sq. ft. facility in regions that score high on the CalEnviroScreen 4.0 Tool and/or have a Disadvantaged Community Designation per SB 535 (DAC) should be prioritized.⁴ This will maximize high-road training, job opportunities, and create economic growth in California communities that need it most.
- Grant applicants should clearly demonstrate historical community connections. Applicants should also demonstrate partnerships or commitments to partner

² Wally Adeyemo (Deputy Secretary of the Treasury) and Julie Su (Acting Assistant Secretary of Labor), “Project Labor Agreements: A Best Practice for Clean Energy Projects Seeking to Meet IRA Wage and Apprenticeship Standards,” *US Treasury*, 18 June 2024, <https://home.treasury.gov/news/featured-stories/project-labor-agreements-a-best-practice-for-clean-energy-projects-seeking-to-meet-ira-wage-and-apprenticeship-standards>

³ <https://experience.arcgis.com/experience/1c21c53da8de48f1b946f3402fbae55c/page/SB-535-Disadvantaged-Communities/>

⁴ In California, high CalEnviroScreen scores indicate that a community is more vulnerable to pollution and has a higher pollution burden than areas with lower scores. The CalEnviroScreen mapping tool uses data from state and federal governments to calculate scores for each census tract in the state. The scores are based on a combination of environmental, health, and socioeconomic factors. <https://oehha.ca.gov/calenviroscreen/maps-data>

with local community-based organizations, workforce development boards, and high-road training partnerships.

3. Locating the facility proximal to Direct Lithium Extraction.

- Grant proposals that plan to co-locate the pilot battery manufacturing line where direct lithium extraction is occurring should be scored higher. This creates industry clusters supportive of innovation, maximizes high-road job training and opportunities, and creates economic growth for the communities impacted by direct lithium extraction.

4. Community Benefit Agreement.

- Grant proposals that include a Community Benefit Agreement (CBA) that describes how the proposed project includes specific and measurable benefits to local communities and workers from priority populations, DACs (Disadvantaged Community), low-income communities, and tribal lands in accordance with CalEnviroScreen 4.0 Tool. Applicants should display knowledge of local challenges/opportunities and define how the pilot line program will provide local benefits.
- Grant proposal should describe the Applicant’s meaningful and inclusive engagement with local community-based groups and organizations on the environmental and employment impacts of the proposed project. In addition, such CBAs should detail how the communities that are impacted by direct lithium extraction will be meaningfully included in the permitting and consideration of the development of related manufacturing projects in the region.

5. Potential to match and/or increase funds.

- Grant applications should be scored higher if they leverage matching funds and/or in-kind contributions for workforce training, curriculum development, and operations and maintenance.⁵

6. Partnership with a Local Registered Apprenticeship Program.

⁵ “Operations and Maintenance” refers to the performance of routine, preventive, and scheduled/unscheduled action and activities required to maintain and operate manufacturing facility/equipment.

- Grant applicants who either are, or partner with, a Registered Apprenticeship Program offers industry-driven, experienced, structured training and instruction for immediate workforce and curriculum development. A Registered Apprenticeship Program also has experience connecting job seekers with employers. This experience will increase high-road job opportunities for the emerging battery manufacturing workforce through paid work experience and nationally recognized credentials.

7. Self-Sustaining Model

- Grant proposals that describe how they will be self-sustaining after the pilot program concludes should also be scored higher. This will ensure the ongoing benefits of such a program for the battery manufacturing industry and the high-road jobs and opportunities this program can continue to generate.

The Battery Pilot Manufacturing Line represents an opportunity for the State of California to ensure that the development of geothermal and lithium resources maximizes economic benefits, high-road employment, high-road job training, and other community benefits for the County of Imperial. The IBEW 569 stands with the County of Imperial to uplift policies and implementation measures that encourage local renewable energy investments that provide high-road, local jobs, while minimizing adverse effects on the environment and public health.

We look forward to continuing to work in partnership to develop our local skilled and trained green energy workforce in the battery manufacturing industry.

In Solidarity,



Jeremy Abrams
Business Manager
IBEW 569

Cc:

Chair.Hochschild@energy.ca.gov

CommissionerGunda@energy.ca.gov

CommissionerGallardo@energy.ca.gov

CommissionerMcAllister@energy.ca.gov

CommissionerMonahan@energy.ca.gov