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July 16, 2009

Pat Perez
Panama Bartholomy
California Energy Commission
1516 Ninth Street
Sacramento, CA 95814

Subject: Meet state and federal energy efficiency mandates through the Clean Energy Workforce Training Program and provide key skills for workers

Dear Mr. Perez and Mr. Bartholomy:

The CEC has the opportunity to use American Recovery and Reinvestment Act (ARRA) State Energy Program (SEP) funds to provide workers important skills they need and to meet state and federal energy efficiency mandates. Because SEP funds require assurance that the state will achieve at least a 90% compliance with the state's energy codes,¹ expenditures of these funds, including the Clean Energy Workforce Training, should seek to improve code compliance and enforcement throughout California.

Currently, there is a demonstrable need for increased compliance with Title 24 energy efficiency standards. Studies and anecdotal evidence have demonstrated that many residential and commercial buildings do not meet energy efficiency standards. The CEC uses a rule of thumb of 70 percent compliance, indicating that 30% of energy efficiency opportunities are lost. Ample resources must be made available to train builders, contractors, and certify local building inspectors according to the 2008 Energy Code Compliance Manuals (Residential and Non Residential), and to ensure that building code standards are applied properly and uniformly across California.

To this end, the CEC should require that any SEP-funded worker training programs include Title 24 compliance. By receiving Title 24 training, workers not only obtain the basic skills they need to build *any* building in California, they also learn the foundation for more advanced energy efficiency and green building techniques. Training workers on Title 24 and advanced techniques provides critical, career-oriented skills that will allow them to thrive in the new, green economy.

To ensure that these trainings result in improved compliance, SEP funds should also be used to educate key personnel in the building industry and in building departments. Between 1995 and 2001, the CEC successfully partnered with the Building Industry Institute to provide trainings that focused on purchasing and contracting personnel and field superintendents. This program, called the Builder Energy Code Training (BECT), was very successful in cost-effectively improving compliance.² The CEC can similarly engage local building department's personnel, such as plan checkers and building inspectors, in appropriate trainings.

¹ ARRA, H.R. 1 § 410 (a)(2)(C)

² Building Industry Institute, *Builder Energy Code Training, Contract No. 400-00-011, Final Reports 2001 and 2000*

To efficiently use SEP funds, the CEC can take advantage of overlap between trainings for workers, builders, and building departments. It should provide funding incentives and/or preferences for Title 24 workforce trainings that builders or building department personnel commit to attending. Where trainings built around workers are not applicable, the CEC should partner with organizations that specifically train builders and building departments, giving priority funding to entities who consistently deliver quality training and certification programs, such as those that publish the base building, electrical, mechanical and plumbing code documents.³

State and federal law indicate that the CEC should use SEP funds to improve compliance with state energy efficiency standards. For workforce training funds, that means funding Title 24 energy efficiency training for workers, builders, and building departments, encouraging overlap between trainings as appropriate.

Sincerely,

Lauren Navarro
Attorney
Environmental Defense Fund

Lara Ettenson
Director, CA Energy Efficiency Policy
Natural Resources Defense Council

³ I.e. the International Code Council, National Fire Protection Association (publisher of the National Electrical Code) and the International Association of Plumbing and Mechanical Officials.