

March 31, 2011

California Energy Commission
Docket Office, MS-4
Re: Docket No. 11-IEP-1A
1516 Ninth Street
Sacramento, CA 95814-5512
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DOCKET

11-IEP-1A

DATE MAR 31 2011

RECD. APR 01 2011

Re: California Energy Commission (“Energy Commission”) Docket No.
11-IEP-1A: National Center for the Clean Energy Workforce

To Whom It May Concern:

Southern California Edison Company (“SCE”) appreciates the opportunity to participate in the Energy Commission workshop on the National Center for a Clean Energy Workforce (“NCCEW”) and to provide comments on the topics discussed there and in the Consultant Report.¹ The objective of the workshop was to bring all stakeholders together to provide input for NCCEW’s establishment, funding, governance and operation.

SCE supports the Energy Commission’s goal “to help strengthen the capacity of California and other states to build a clean energy economy rooted in a skilled workforce with broad access to good green jobs.”² While SCE supports this goal, SCE is concerned that the source of funding for the NCCEW is unclear. SCE strongly encourages the Energy Commission to join existing organizations that are currently working towards similar goals to avoid redundancy and duplication of efforts.

It is unclear from the workshop and the Consultant Report where the funding for the NCCEW will be obtained. The Consultant Report states that the Energy Commission is hoping to secure American Recovery and Reinvestment Act (“ARRA”) funding for the NCCEW.³ However, SCE understands that ARRA funding is exhausted. Therefore, this source of funding will not be available for the creation of the NCCEW. If the ARRA funds are unavailable, the Energy Commission should not expect to use ratepayer funding to create the proposed NCCEW.

SCE’s ratepayers contribute to a number of successful workforce initiatives with direct and tangible benefits. Moreover, other California state agencies are also implementing workforce

¹ *The National Center for a Clean Energy Workforce: A Scoping Study*, CEC-500-2011-027, February 2011 (the “Consulting Report”).

² Consulting Report, p. i.

³ Consulting Report, p. 3.

training initiatives for clean energy jobs.⁴ SCE has a robust, sustainable pipeline for the training of a skilled energy workforce through its participation in a number of workforce development efforts including:

1. Certificate Programs – SCE supports certificate programs at East Los Angeles Skills Center, El Camino College, and Los Angeles Trade Tech College, among others.
2. University Partnerships – SCE partners with local universities, including University of California and California State University systems within SCE’s service territory, to develop power engineering curriculum that is relevant to the electric industry.
3. Energy Efficiency (“EE”) Programs – SCE’s EE organization offers programs on efficient equipment installation and certification programs for EE best practices and awareness programs for EE careers through the activities of the Statewide Workforce Education & Training programs.
4. The Edison International (“EIX”, SCE’s parent company) Corporate Contribution Program – EIX’s Corporate Contribution Program’s giving mission includes 21st Century workforce development. As part of this program, EIX provides grants from shareholder funds to community colleges in SCE’s service territory for green job training activities.
5. Center for Energy Workforce Development (“CEWD”) – SCE participates in CEWD, a national non-profit organization focused on developing a skilled energy workforce.⁵ CEWD partners with the International Brotherhood of Electrical Workers and the Edison Electric Institute (“EEI”).

The Energy Commission should work with these existing organizations to avoid duplication of efforts and unnecessary costs. In particular, SCE strongly encourages the Energy Commission to affiliate with the CEWD because both the Energy Commission and CEWD have similar goals (e.g. building a skilled workforce pipeline that will meet future energy needs). In addition, the Energy Commission could potentially gain many of the benefits of non-profit status without creating a new organization from scratch.

SCE holds a leadership position in CEWD’s associated state consortium, the California Energy & Utility Workforce Consortium (“CEUWC”). The CEUWC’s goals of identifying jobs and skills in greatest need in the state, partnering to improve and/or create training programs, building awareness of the need for skilled workers in local communities, and creating a sense of excitement around the energy and utility industry in the state are similar to the goals of the proposed NCCEW. Pacific Gas & Electric, the Community College System, California Labor & Workforce Development Agency, and the California Workforce Investment Board are also

⁴ <http://energy.ca.gov/cleanenergyjobs/resources.html>

⁵ <http://www.cewd.org/>

members of CEUWC. The opportunity to collaborate with these and other organizations could improve the Energy Commission's efforts.

SCE appreciates this opportunity to comment on the workshop and Consultant Report and looks forward to continuing to work with the Energy Commission and being an active participant in the 2011 Integrated Energy Policy Report process.

Sincerely,

/s/ Manuel Alvarez

Manuel Alvarez, Manager
Regulatory Policy and Affairs