

## Energy - Docket Optical System

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**From:** Andy Berg [aberg@necasandiego.org]  
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**To:** Energy - Docket Optical System  
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California Energy Commission

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**13-CCEJA-01**

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California Energy Commission,

A key bullet point in the Secretary of State's Title and Summary for Proposition 39 stated that the measure *"dedicates \$550 million annually for five years from anticipated increase in revenue for the purpose of funding projects that create energy efficiency and clean energy jobs in California."* My comments will focus on the jobs aspect.

From the Department of Industrial Relations (DIR) website:

***"Existing law requires that persons performing work as electrician under a C-10 licensed contractor be certified pursuant to certification standards established by the Division of Labor Standards Enforcement. "Electricians" is defined as all persons who engage in the connection of electrical devices for electrical contractors licensed pursuant to Section 7058 of the Business and Profession Code, specifically, contractors classified as electrical contractors in the Contractors State License Board Rules and Regulations [Labor Code § 108 (c)]."***

A bulk of the work that will be done under Proposition 39 will be electrical and will therefore require the use of certified journeyman electricians, certified apprentices or certified electrical trainees. Anyone from either of the latter two categories must be currently enrolled in school and supervised (one to one) on the job by a certified journeyman electrician.

Our apprentice program is a 5-year course and before even being eligible to test to become a certified journeyman electrician, the candidate must have 8,000 documented on-the-job hours as either a trainee or an apprentice. No offense to the California Conservation Corps who do amazingly good work, but it is hard to see how they can provide sufficient, if any, labor that meets the DIR requirements.

Fortunately, there are sufficient numbers of apprentices enrolled in California certified apprenticeship programs as well as certified electricians who have graduated from these programs. That is where the labor pool should come from. These schools are already in place, already training and have the capacity to meet the additional needs for trained and state-legal labor that will arise as Prop 39 projects begin.

Another important consideration that needs addressing is the qualification of the contractors who will be tasked with this important work. Since much of this work will involve lighting retrofits and the installation of advanced lighting controls, it is important that the controls actually work as advertised and the only way to ensure that is to require that a contractor be certified through the California Advanced Lighting Control Training Program (CALCTP).

From the CALCTP website ([www.calctp.org](http://www.calctp.org)):

*“A CALCTP-Certified contractor is:*

- *A state licensed C-10 electrical contractor.*
- *Successfully completed the CALCTP Business Development Training program.*
- *Successfully completed the CALCTP Technical Installation program.*
- *Employs CALCTP-certified general electricians.*
- *Proficient in Advanced Lighting Controls.”*

In addition, beginning January 1, 2014, California law (Title 24, Part 6) will require that any work involving advanced lighting controls be checked and certified a s correct by a Certified Acceptance Tester. It is imperative that this requirement also be spelled out in the contractor qualifications.

The projects undertaken under Prop 39 are essential if we are to move forward on our path to greater energy efficiency. However, these projects will only be a step forward if they are done safely and correctly. A poorly done electrical installation can result in **loss of property, serious injury and even death**. It is therefore imperative that your guidelines require the use of contractors and electricians who certified to do this work and do it correctly.

Thank you,

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