



October 24, 2013

Robert B. Weisenmiller  
Chair  
California Energy Commission  
1516 Ninth Street  
MS-29  
Sacramento, CA. 95814-5512



**Re: Docket Number 13-CCEJA-1  
Comments on Proposition 39**

Dear Mr. Weisenmiller:

Thank you for the opportunity to submit comments on the Proposition 39: California Clean Energy Jobs Act – 2013 Program Implementation Draft Guidelines.

On behalf of the Emerald Cities Collaborative (ECC), we commend you for your leadership to improve California's schools, address climate change and improve the California economy. We offer the following comments to support successful program implementation and ensure the best possible data on jobs and workforce outcomes from Proposition 39 investments.

SB 73 directs the State of California to track and report job creation and training outcomes resulting from Proposition 39 investments. This will provide critical data to measure progress toward the Proposition's goal to "create good-paying energy efficiency and clean energy jobs for California" and will help implementers evaluate program outcomes and improve program performance.

ECC strongly urges you to ensure accountability and good quality jobs and workforce data by requiring local education agencies (LEAs) to track and report metrics for job quantity and job quality, along with the demographic and geographic distribution of workers.

A multitude of LEAs serve low-income, disenfranchised communities. It is our hope that there are special ongoing efforts made to train and provide quality jobs to disadvantaged youth and others that continue to face barriers to employment.

At minimum, LEAs should require contractors to report data based on certified payroll records for each worker employed on a project that receives Proposition 39 funds, including:

- Job classification by trade, craft, and prevailing wage category;
- Job classification by journey level or apprenticeship level;
- Hourly rate of pay;
- Number of hours worked per week; and
- Zip code of worker residence.

The information above should be linked to a description of work performed (scope of work) so that the job outcomes can be evaluated on a project-by-project basis.

ECC recommends using an online labor compliance reporting system to ensure accurate and consistent data, generate comprehensive reports, and facilitate reporting for LEAs, contractors and the State of California. With such a huge undertaking, it is important to provide sufficient administrative and program support to tackle the projected workload. We strongly urge that staff be added, as needed, to ensure successful reporting, evaluation and assessment.

We appreciate this opportunity to comment and look forward to reviewing the final draft of the Guidelines. Questions regarding these comments can be addressed to me.

Sincerely,

Denise Fairchild  
President