To: California Energy Commission

From: Undersigned Organizations

October 25, 2013

## DOCKETED 13-CCEJA-01 TN 72228

OCT. 25 2013

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

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 undersigned organizations, we commend you for your leadership to improve California's schools, address climate change and improve our state's 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 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 in California" and will help implementers evaluate program outcomes and improve program performance.

We strongly urge 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. For example, LEAs could 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 apprentice level;
- Hourly rate of pay;
- Number of hours worked per week; and
- Zip code of worker residence.

Any required information 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.

We recommend 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.

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 James Barba at james.barba@thenextgeneration.org or (415) 255-5689.

Thank you,

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