Title

Comments on California Energy Commission's Comprehensive Energy Efficiency Program for Existing Buildings (AB 758) Scoping Report

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Comments of the UC-Berkeley Donald Vial Center on Employment in the Green Economy on the California Energy Commission's Comprehensive Energy Efficiency Program for Existing Buildings (AB 758) Scoping Report

Dear Commissioners and Staff:

Thank you for the opportunity to present comments on the Comprehensive Energy Efficiency Program for Existing Buildings (AB 758) Scoping Report. The following comments expand on my verbal comments presented on October 9, 2012 as a panelist for the AB 758 Scoping Report Workshop.

We believe that the Scoping Report properly defines the market needs, opportunities and areas of action that the CEC and others involved in AB 758 should focus on with respect to workforce education and training. These are:

1. Promoting the use of stackable credentials by key training programs;
2. Supporting ongoing alignment of workforce planning efforts;
3. Defining quality standards for energy efficiency work;
4. Promoting the value of worker skill certifications in the market; and
5. Addressing skill gaps of incumbent workers.

We have two overarching recommendations that affect all of these areas:

- All planning and investing in the workforce development arena by the CPUC, the IOUs and the CEC should be carried out in coordination with the California Labor and Workforce Development Agency, under some kind of an inter-agency advisory committee that includes the California Workforce Investment Board, the Division of Apprenticeship Standards, the Department of Industrial Relations, the Employment Training Panel, and the system-wide offices of community colleges, California State University and University of California. The Green Collar Jobs Council may be a good forum for this effort.
- The key untapped strategic opportunity in the state for the commercial and MUSH (municipal, universities, schools, and hospitals) building sector is a major new focus on investing in and using the state-certified apprenticeship system, through an inter-agency agreement between the DAS, the IOUs, the CPUC and the CEC. Construction trades workers make up about 2/3 of the labor force involved in energy efficiency work, but have received less targeted support from IOU WE&T programs than their numbers warrant. Apprenticeship is the state's key resource for training these workers in long-term career pathways (new and incumbent workers), and AB 758 implementation efforts focused on workforce development should be sure to include DAS as an integral partner in planning.

In addition to these overarching recommendations, we offer specific comments about ways to address the five market needs identified in the scoping report. We believe that developing stackable credentials and aligning training programs are intertwined and must be addressed together; the same goes for defining quality standards for energy efficiency work and promoting the value of worker skill certifications in the market.

1. Developing stackable credentials and aligning training programs:

   The CEC's role in promoting training alignment and stackable credentials involves supporting these efforts through its bully pulpit, its role in EPIC funding for training, its involvement in federal grant proposals, its influence on ratepayer programs, and its involvement in any inter-agency agreements or advisory boards addressing training.

   For the construction trades (2/3 of energy efficiency jobs), the main opportunity lies connecting apprenticeship with community colleges and training supported by the Workforce Investment Act (WIA). There are new efforts in California to improve alignment and linkages between apprenticeship and the community colleges and WIA funds. AB 554, passed last year, requires that WIA training dollars going to help workers obtain training to work in the construction trades or other apprenticeable occupations be aligned with corresponding state-certified apprenticeship programs. There are also efforts within the community colleges to better coordinate with apprenticeship by supporting pre-apprenticeship programs that are articulated with apprenticeship programs, in order to create pipelines into those programs.

   For the professional occupations (1/3 of energy efficiency jobs), such as architecture, engineering and construction management, the main opportunity for stackable credentials and alignment is in encouraging articulation between community and four year colleges, to insure that those who enter college through community college have a pathway toward completing a four year degree. For community college programs that specialize in renewable energy or energy efficiency, 1 year certificates and 2 year AA degrees need to include requirements that can help students move into four year programs in architecture, engineering and other key professional occupations that are linked to clean energy.

2. Promoting quality standards and the value of certifications:

   The CEC can play a major role in developing quality standards for energy efficiency, and this should be done in partnership with the labor agency and other energy agencies. The CEC has experience in developing standards for energy efficiency work through the codes and standards process, as well as certifications for HERS and related raters.

   Standards including contractor pre-qualification standards and skills certifications for workers should be adopted on all ratepayer-funded incentive programs, where these quality measures can be attached to voluntary programs to encourage market recognition. They should also be mandated here necessary on code changes and other regulations over which the CEC has some authority.

3. Addressing skill gaps of incumbent workers

   Most of the workforce that needs to be reached with energy efficiency skills training are incumbent workers rather than new workforce entrants, since there are relatively few brand-new jobs, compared to jobs that already exist but may require some changes in practice. It is

much more difficult to reach incumbent workers because they are already out working in the field, and not necessarily seeking out training. Skills upgrade programs are best done in collaboration with incumbent workers' employers to insure that the latter see value in the training and commit to supporting their workers to change practice in the field.

For trades workers needing skills upgrading, there are far more opportunities if they are employed by companies that participate in the apprenticeship system, versus not. Journey-level workers (i.e. those that have graduated apprenticeship programs) must do continuing education to maintain their journey card in most cases. Moreover, since journey-level workers for the joint labor-management-run programs (which are the majority) generally maintain membership in their union, it is feasible to locate and communicate with them via well-established communication channels. Journey upgrade programs should be used to address skill gaps in the trades. These programs can carried out in partnership with community colleges for the classroom portion of upgrade training, which can allow workers to simultaneously obtain educational credit.

For professional design workers, such as engineers and architects, upgrade training should be linked to licensure and membership in professional organizations through the continuing education requirements.

In both cases (professional and trades), specialty energy efficiency occupations, like auditor, should be integrated into related trades and engineering occupational training, not created as separate programs. This is important because auditors need to have a full understanding of building systems, because the numbers of jobs in these specialty areas are very low (2% according to the California WE&T Needs Assessment) and because workers need to have broader occupational training in order to succeed in their careers. To the extent possible, the state should use the work being developed nationally for auditor, retro-commissioning, etc, that the DOE and NREL are conducting.

We appreciate this opportunity to comment and look forward to working the CEC and other stakeholders as AB 758 implementation moves forward.

Sincerely,

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