State Building and Construction Trades Council of California

ROBBIE HUNTER
PRESIDENT

J. TOM BACA
SECRETARY-TREASURER

Chartered by
BUILDING AND CONSTRUCTION TRADES DEPARTMENT
AFL - CIO

California Energy Commission
DOCKETED
12-EBP-1
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California Energy Commission
Dockets Office, MS-4
Re: Docket No. 12-EBP-1
1516 Ninth Street
Sacramento, CA 95814-5512
docket@energy.ca.gov.

Re: Comments on Comprehensive Energy Efficiency Program for Existing Buildings Draft Action Plan, Docket No. 12-EBP-1

Dear Commissioners:

The State Building and Construction Trades Council appreciates the opportunity to comment on the Draft Action Plan and thanks the Commission for its leadership in promoting energy efficiency.

The Council is a federation of 22 local building trades councils, 13 district labor councils, and 134 local unions that represent more than 400,000 construction workers in California, including journeypersons and apprentices. The council's affiliates co-sponsor with their industry partners the state-approved apprenticeship programs that train about 95 percent of the apprentices in the building and construction trades in California.

The Draft Action Plan's provisions regarding workforce development should be revised because the Draft Action Plan does not take into account the existing apprenticeship system overseen by the State of California for training workers in the construction industry. The primary focus for the development of the workforce to upgrade the energy efficiency of existing building stock should be on working with the state-approved construction apprenticeship programs in which more than 50,000 Californians already are enrolled and which already provide journeyperson upgrade training. Otherwise the workforce development component of the Action Plan will not be effective and, even worse, could undermine the efforts of the stakeholders in workforce training, including labor organizations, contractors associations and the Division of Apprenticeship Standards, to protect workers from exploitation while training them for real careers in the construction industry with health benefits and pensions.

Pursuant to the California Labor Code, the Division of Apprenticeship Standards is responsible for approving and overseeing apprenticeship programs that agree to meet minimum standards established by the State to protect apprentices. The apprentices registered in these programs "earn while they learn" – they are paid a percentage of the journeyperson wage to work under supervision while also receiving related and supplemental classroom and laboratory instruction.

1225-8th Street, Suite 375 • Sacramento, CA 95814 • (916) 443-3302 • FAX (916) 443-8204

As the apprentice progresses through the program, the wage rate increases, and at graduation the apprentice has the skills to continue working as a journeyperson in the applicable craft.

More than 50,000 workers presently are enrolled in state-approved apprenticeship programs in the construction trades in California, the vast majority of them in programs jointly sponsored by contractors and labor organizations. The funding for these programs comes from per-work-hour training contributions required by collective bargaining agreements, which amount to tens of millions of dollars each year. The related and supplemental instruction in these programs is provided in conjunction with a Local Educational Agency – either a school district or community college. California law regulates the selection and outreach procedures used by these programs to provide equal opportunity. The Division of Apprenticeship Standards also audits these programs and hears apprentice complaints to prevent employers from exploiting the apprentices.

These joint apprenticeship programs also provide journeyperson upgrade classes to workers in the craft, including with regard to new technologies to promote energy efficiency. Many of the programs have state-of-the-art training facilities. For example, the new IBEW-NECA Zero Net Energy Center in San Leandro is one of the first energy- neutral commercial buildings in the United States to be retrofitted from an existing structure. Governor Brown cut the ribbon for the opening ceremony at this apprenticeship facility on May 30.

The Action Plan for developing the workforce to upgrade the energy efficiency of existing buildings should be focused primarily with working with the existing apprenticeship infrastructure. That infrastructure already brings together the relevant stakeholders, who already have developed and invested in a successful training model that already is overseen by State regulators. The apprenticeship programs already train workers in the "green" skills relevant here, and they can expand to meet the needs of the industry as demand for workers increases. Most of the programs maintain waiting lists.

The failure to work through the existing apprenticeship system is likely to result in duplication of efforts and with providing workers with a narrow set of skills that will not enable them to have real careers. It also is likely to undermine the programs that do train workers for real careers and that have state-approved standards for wages and benefits to protect the apprentices.

The Council stands ready to work with the Commission on its Action Plan for workforce development. I would be happy to discuss this issue further with Commissioners and to take Commissioners and their staff on a tour of some of our existing apprenticeship training facilities.

Please contact me at (916) 443-3302 if I can provide more information. Thank you for the opportunity to comment on the Draft Action plan.

Sincerely,

Robbie Hunter

ROBBIE HUNTER
President

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Opeiu#29/afl-cio