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October 2, 2012

California Energy Commission

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OCT. 02 2012

By: Email

California Energy Commission
Dockets Office, MS-4
1516 Ninth Street
Sacramento, CA 95814-5512
docket@energy.ca.gov

Re: Comments of the California Construction Industry Labor Management Cooperation Trust on the Electric Program Investment Charge Proposed 2012-14 Triennial Investment Plan (Docket No. 12-EPIC-01)

Dear Commissioners and Staff:

We are writing on behalf of the California Construction Industry Labor Management Cooperation Trust to comment on the Proposed 2012-2014 Triennial Investment Plan ("Draft Plan"), prepared for the California Energy Commission pursuant to the Electric Program Investment Charge Program ("EPIC"). These comments are provided pursuant to the September 28, 2012 Commission email extending the deadline to submit comments to October 2, 2012.

The Trust is a joint Labor-Management Cooperation Trust, established by major construction contractors and power generation operators in California together with the unions that represent their employees pursuant to sections 205a and 302(c)(9) of the Labor Management Relations Act, 29 U.S.C. SS 175a, 186(c)(9). The Trust promotes joint labor-management efforts to advance the economic growth and development of California's energy and power generation industries. In accordance with these purposes, the Trust seeks to advance the state's goal of pursuing energy efficiency and clean energy technology policies that benefit utility ratepayers, and to promote the contractor and workforce training necessary to meet the needs of the state's growing green economy.

2670-092cv

In our previous comments,¹ we recommended that the Commission's 2012-2014 Triennial Investment Plan support strategic workforce planning and innovative demonstration projects designed to overcome barriers to the growth of California's clean energy economy. The Trust identified the California Advanced Lighting Controls Training Program ("CALCTP") as an example of the type of training initiative that should be funded by the Commission.² The CALCTP educates, trains, and certifies licensed electrical contractors and state certified general electricians in the proper programming, testing, installation, commissioning and maintenance of advanced lighting control systems in commercial facilities.

The CALCTP is widely acknowledged as a successful example of a sector strategy.³ The Commission itself has recognized the success of the Program by proposing to designate CALCTP as the only prequalified entity to certify technicians that perform acceptance testing for advance lighting systems under the California Building Standards Code, Title 24.⁴ The Program's success is attributed, in large part, to the synergies between employers that co-invest in training through the state-certified apprenticeship programs, and the advantages offered by the technical expertise and funding capacity of the IOUs and the Commission.⁵

The Draft Plan identifies two initiatives aimed at funding training programs utilizing the state-certified apprenticeship programs; the proposal to develop a standardized methodology to access job creation and net jobs; and the proposal to provide grants for the development or enhancement of training and apprenticeship programs to support clean energy deployment programs in IOU service territories.⁶ According to the Draft Plan, grants would be offered to community colleges, universities, and/or third parties for developing new, or enhancing existing, clean

¹ Trust Comments on the California Energy Commission's First Triennial Investment Plan for the Electric Program Investment Charge, August 17, 2012.

² *Ibid.*

³ See University of California, Berkeley's Donald Vial Center on Employment in the Green Economy, *California Workforce Education and Training Needs Assessment for Energy Efficiency, Distributed Generation, and Demand Response*, at p. 116 (available at <http://www.irlc.berkeley.edu/vial/>) ("Needs Assessment"); see also California Public Utilities Commission, Order Instituting Rulemaking to Examine the Commission's Post-2008 Energy Efficiency Policies, Programs, Evaluation, Measurement, and Verification, and Related Issues, Rulemaking 09-11-14, Decision 12-05-015, at p. 274 (available at http://docs.cpuc.ca.gov/PublishedDocs/WORD_PDF/FINAL_DECISION/166830.PDF).

⁴ http://www.energy.ca.gov/title24/2013standards/provider_cert/documents/index.html

⁵ See Needs Assessment, at p. 116.

⁶ Draft Plan, at pp. 143-146.

October 2, 2012

Page 3

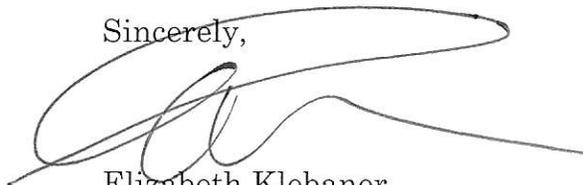
energy training and apprenticeship programs for delivery to target communities in California's IOU territories.⁷ The Trust supports these proposals, and offers the following three recommendations to structure these funding initiatives.

First, as the bulk of California's new green jobs are in the construction trades and the state-certified apprenticeships are the main "college" for skilled trades, we recommend that the Draft Plan be revised to clarify that funding the state-certified apprenticeship programs is a priority for the Commission.⁸ Second, the collaboration with the California Division of Apprenticeship Standards ("DAS") that is contemplated in the Draft Plan should be expanded with the goal of aligning apprenticeship training and skill certifications with the skills necessary to support the IOU-administered energy efficiency incentive programs. This collaboration could include a partnership between the DAS and the IOUs, with the Commission in the role of facilitating the establishment of industry skill standards. In this way, the EPIC Program could directly support the energy efficiency industry by facilitating the development of new curricula or train-the-trainer courses and journey upgrade training for the incumbent construction trades workforce.

Third, the Draft Plan should be revised to promote collaboration between the Commission, the CPUC, the State's workforce development agencies and labor. Involving stakeholders, as well as the DAS and the California Workforce Investment Board, would allow the Commission to take advantage of existing training experience and expertise in the construction industry and apply this knowledge to the energy industry in a more targeted and effective way. This collaboration could involve a panel of experts to guide investments in training, as suggested by the Donald Vial Labor Center in their August 17, 2012 comments.

We thank you for this opportunity to comment and look forward to participating in the later stages of the EPIC Program proceeding.

Sincerely,

A handwritten signature in black ink, appearing to read 'Elizabeth Klebaner', with a long horizontal flourish extending to the right.

Elizabeth Klebaner
Daniel L. Cardozo

⁷ *Id.* at p. 146.

⁸ *See* Needs Assessment, at p 225.