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EPIC - Docket # 12-EPIC-01  
California Energy Commission  
1516 Ninth Street  
Sacramento, CA 95814  
docket@energy.ca.gov

10-2-2012



**RE: Comments of the Division of Apprenticeship Standards on *The Electric Program Investment Charge: Proposed 2012-2014 Triennial Investment Plan* (Docket No. 12-EPIC-01)**

Commissioners:

I was very pleased to see that the CEC intends for EPIC to address the need for workforce development and planning to help produce a high-quality clean energy industry in California. In particular, the Division of Apprenticeship Standards appreciates the CEC's emphasis on calibrating training to employer demand, and their suggestion to develop a partnership with DAS. I offer several suggestions for how the CEC could enhance and expand their proposed plans in this area.

S15.2 proposed funding "training and apprenticeship programs" solely through community colleges, universities, or third-parties. While these institutions have a valuable role to play in workforce education and training, the state's primary resource for training the hands-on clean energy workforce is the state-certified apprenticeship system – and every state-registered program incorporates mandatory classroom instruction conducted through a local community college or adult education provider. As described in my previous comments, apprenticeship trains and certifies journeymen in the traditional construction trades, which make up about 2/3 of the state's energy efficiency workforce. Furthermore, apprenticeship is directly driven by industry demand, and also includes mechanisms for skill upgrading to incorporate new practices and technologies. No other training institution can offer this core, career-track training for the construction trades. Therefore, I would recommend that in S15, the proposed funding recipients specifically name both the state's Division of Apprenticeship Standards (DAS) and individual DAS-approved "registered apprenticeship program sponsors" who are the actual training providers.

Although most apprenticeship programs are self-sustaining financially through hourly contributions of employees and employers to the training fund, EPIC can support apprenticeship programs as the key building trades training institution by supporting the rapid skills upgrading associated with emerging technologies for both new apprentices and journey-level (who have graduated the apprenticeship programs and are in the work force). Funding would support new, clean energy specific curriculum development, train-the-trainer initiatives, and collaborations with other state agencies and industry partners. One example of a project that would benefit from the involvement of the CEC via EPIC is the

DAS's plan to develop a collaboration with the IOUs to align training and certifications in energy efficiency sectors. In addition to help funding the partnership, the CEC could oversee the establishment of skills standards, which would take advantage of the CEC's expertise in setting standards and also build closer institutional ties between the state's energy and workforce agencies.

I also would like to echo DAS's support for the Donald Vial Center's August 17<sup>th</sup>, 2012 recommendation for the creation of a panel of workforce agencies and experts to oversee the development of the workforce portions of EPIC. DAS and our other workforce development agency partners are eager to expand our relationship with CEC and the CPUC, and to participate more fully in workforce planning for the clean energy sectors. The Vial Center's proposal would help us accomplish this, and would strengthen EPIC's workforce development efforts by building off the state's existing resources and expertise in this arena. This could help the CEC and other state energy agencies influence and contribute to continuous improvement in the curricula of the major state workforce education and training systems rather than duplicate efforts or fund small, unsustainable programs that only haphazardly reach the work force.

I thank you for this opportunity to comment on EPIC, and look forward to collaborating with the CEC. I hope that this marks the beginning of deeper, more meaningful collaboration between the state's energy and workforce agencies.

Sincerely,

A handwritten signature in black ink that reads "Diane M. Ravnik". The signature is written in a cursive style with a large, sweeping flourish at the end of the name.

Diane Ravnik  
Chief, DAS