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October 26, 2012

Comments of the UC-Berkeley Donald Vial Center on Employment in the Green Economy on the California Energy Commission's First Triennial Investment Plan for the Electric Program Investment Charge (EPIC) Program (Docket No. 12-EPIC-01)

Dear Commissioners and Staff:

We would like to thank the Energy Commission for its responsiveness to our comments on how to improve the workforce components of the EPIC portfolio. Although not all of the suggestions from our comments submitted on October 2nd were integrated into the EPIC Final Staff Report, we were pleased to see that some of our recommendations were taken into account in the revisions. We have a few minor suggestions for additions or revisions to the Report.

In particular, we are supportive of the changes made to *S17.1 Proposed Funding Initiative: Provide Grants for to Develop and Enhance Training and Apprenticeship Programs to Support Clean Energy Deployment Programs in IOU Service Territories*, which indicates that EPIC will partner with the Division of Apprenticeship Standards and others to provide competitive grant funding to support new clean energy curriculum development, train-the-trainer initiatives, and appropriate certifications for energy related apprenticeships, focusing on the IOU service territories (p. 180). We think this is an excellent use of the EPIC funds allotted for S17, and we would like to note that the IOUs should also be expected to contribute financially to this effort to ensure its success. As a minor addition, we would like to request that apprenticeship programs and participating unions and employers be included in the list of stakeholders on page 181.

Although we were pleased to see that the report no longer includes the flawed proposal for a workforce study that we found to be somewhat duplicative, we did not see a proposed RFP process for research on key barriers and strategic opportunities related to workforce issues, which we suggested as a replacement. None of EPIC's proposals on research addressed workforce issues, which we feel is a significant oversight. Clearly, there are many competing priorities for clean energy research, but we believe EPIC is well-positioned to draw attention to the critical workforce issues that will affect California's ability to meet our clean energy goals by supporting rigorous research in this area. We refer to our 10/2/12 comments on this point. We also want to reference our comments on the CPUC-IOU workforce and education research roadmap, (available upon request) where we noted that the ratepayer-funded research related to workforce education and training in the IOU EM&V portfolio is quite limited. That research is unlikely to cover the strategic research we outlined in our first

comments, leaving EPIC the only source for funding. Strategic research on workforce could easily be included in the EPIC research agenda.

Finally, we'd like to reiterate our suggestion that EPIC include seed funding for a University-based Center on the Clean Energy Workforce modeled after the technology centers that the CEC has seeded in the past, such as the UC Davis Advanced Lighting Center. This Center would carry out research on workforce issues and could administer the RFP process for strategic research that we describe above. The Center would be a major asset in helping advance the state toward the strategic objectives that EPIC lays out for Market Facilitation and Research, and we hope that the Commission will reconsider this proposal.

We appreciate the CEC's efforts to address our concerns and thank you for this opportunity to comment.

Sincerely,

Dr. Carol Zabin, Co-Chair of the Donald Vial Center
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