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## **BlueGreen Alliance, IBEW-NECA LMCC and JCEEP Comments on PG&E Conceptual Discussion of Business Plan Metrics**

The BlueGreen Alliance, the California State Labor Management Cooperation Committee for the International Brotherhood of Electrical Workers and the National Electrical Contractors Association (“IBEW-NECA LMCC”) and the Joint Committee on Energy and Environmental Policy (“JCEEP”) support PG&E’s conceptual discussion of how the business plans will incorporate metrics. We believe that further discussion, however, is necessary to clarify what specific interventions will incorporate metrics in the business plans. In particular, metrics will need to be identified in the business plans to address workforce quality and diversity goals.

As discussed in the Coalition for Energy Efficiency Topic Proposal on Workforce Standards, the business plans need to include clear and detailed descriptions of how PA incentive programs will ensure energy efficiency measures are installed by a trained, skilled and diverse workforce. In order to meet this goal, it is critical that the business plan include metrics for achieving these goals. The Intervention or Intervention Strategy would be: (1) realize the potential energy savings from EE programs through engagement of a highly skilled workforce; and (2) ensure incentives support middle class career pathways for workers from disadvantaged communities.

The tactics would be those set forth in the University of California, Berkeley, Donald Vial Center for Employment in the Green Economy (UCB-DVC) report, *“Workforce Issues and Energy Efficiency Programs: A Plan for California’s Utilities.”* This report sets forth a number of specific tactics that can be implemented to increase the likelihood that energy efficiency measure installers will be hired not just based on cost, but also based on quality and on the commitment to provide middle class career pathways to workers from disadvantaged communities. The metric would be the percentage of incentives that are installed by a skilled and trained workforce and the percentage of incentives that are installed by contractors that have demonstrated a commitment to provide middle class career pathways to workers from disadvantaged communities.

Without clear metrics for workforce quality and opportunities for middle class career pathways for workers from disadvantaged communities, the Commission is unlikely to see any meaningful progress on these long-standing goals.