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April 3, 2020

Executive Director Alice Stebbins
 California Public Utilities Commission
 505 Van Ness Avenue
 San Francisco, CA 94102

Re: Maintaining a clean energy workforce during the COVID-19 crisis

Dear Executive Director Stebbins:

On behalf of the signatories, we appreciate the Commission’s prompt attention to ensure that the low-income energy efficiency implementation and contractor networks remain intact during the COVID-19 emergency.¹ By this letter, we recommend additional steps that the Commission can take to ensure the broader clean energy workforce community is supported throughout the unknown duration of this crisis.

By establishing a transparent, strategic, and holistic plan to support workers, the Commission can be assured that the critical workforce will continue to exist after the immediate crisis has subsided. This is necessary to support individual workers, ensure customers can receive important energy efficiency upgrades, and enable the state to meet its ambitious climate and energy goals.

We also appreciate the emergency motion of The East Los Angeles Community Union (TELACU), The Association of California Community and Energy Services (ACCES), the Maravilla Foundation and the Energy Efficiency Council (EEC), as it helped to bring attention to the issue.² While we understand the motion is now dismissed,³ we continue to support its request that the Commission play a critical role in reducing the financial hardship on ESA contractors.

¹ Alice Stebbins, “Assurance to Energy Savings Assistance (ESA) contractors during COVID 19 pandemic,” March 23, 2020. pp 3.

² Joint Parties, “The Joint Emergency Motion of [Joint Parties] Asking the Commission to Direct the Investor-Owned Utilities to Continue Funding the Energy Savings Assistance (ESA) Program Workforce in Order to Allow Workers to Continue Receiving Wages and Healthcare Benefits During the Current Coronavirus Pandemic Emergency,” March 18, 2020.

³ Ava Tran, Email Communication “19-11-003 et al.: Email Ruling Dismissing the Joint Emergency Motion of The East Los Angeles Community Union the Association of California Community and Energy Services, the Maravilla Foundation and the Energy Efficiency Council,” March 25, 2020.

Date removed from posting 5/8/2020

In addition, we support exploring the items raised in the response by the Public Advocates Office, calling for a solution that relies on data to ensure the funding is prudently spent and reaches those facing economic hardship,⁴ as well as in the California Efficiency and Demand Management Council's letter submitted on April 2, 2020.

We therefore offer the following recommendations:

1. Create a public process inclusive of all impacted workers

We recommend that the Commission initiate a targeted, time-limited, public process to establish a plan that will address COVID-19-related challenges faced by workers implementing clean energy programs approved by the Commission. This process should ensure solutions tailored for small businesses, non-profits, and small contractor groups to manage workforce retention challenges and enable a seamless return to work after the crisis. In addition, any proposal should make sure that workers who might still be in the field, or those that may return as soon as shelter-in-place requirements are lifted, have sufficient protective gear to stay safe.

One option is to launch a short-term track (e.g., no longer than 4-6 weeks) in the Integrated Distributed Energy Resources proceeding (R.14-10-003), which would allow for stakeholder engagement and comment opportunities including: (a) public meetings or workshops, (b) data collection to understand the financial impact on workers as well as the breadth of the need, (c) options for work tasks during COVID-19 social distancing requirements, and (d) a proposed plan of action for the mid- and longer-term. Connecticut and New York State have initiated similar processes that could be used as a guide.⁵

2. Ensure prudent distribution of funding

To ensure that customer funding is supporting those in need, such as those unable to receive state or federal support, we recommend that the Commission outline a time-sensitive approach to gather important data. The Commission should also determine how it will oversee that any funds advanced by the Program Administrators truly go to those employers and contractors who are in need, and not for other, non-essential purposes.

3. Evaluate options for work tasks during COVID-19

While limited, there may be opportunities for work that can be done remotely. The Commission should explore alternative work opportunities for contractors impacted by 'shelter-in-place' requirements. Items could include online training, online audit or remote home diagnostics in preparation for when workers are able to return to work, or other options for the short- and potentially mid-term depending on the duration of the pandemic. Any approach must account for and address challenges that customers might have accessing information, such as by having limited cellular or internet accessibility as well as language barriers.

⁴ Public Advocates Office, "Response of the [PAO] to the Joint Emergency Motion Asking the Commission to Direct the Investor-Owned Utilities to Continue Funding The [ESAP] Workforce in Order to Allow Workers to Continue Receiving Wages and Healthcare Benefits During the Current Coronavirus Pandemic Emergency," March 23, 2020.

⁵ See: New York State proceeding as an example, which includes a presentation by the New York State Department of Public Service on the COVID-EE Input Session and numerous stakeholder comments with recommendations for action: <http://documents.dps.ny.gov/public/MatterManagement/CaseMaster.aspx?Mattercaseno=18-M-0084>.

We look forward to working with the Commission and stakeholders to establish an effective plan to address the needs of workers hit by the current economic crisis and thank you for considering our request as you evaluate next steps.

Respectfully Submitted,

/s/Alexis Cureton

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