



**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

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Application of Southern California Edison
Company (U 338-E) for Approval of Energy
Efficiency Rolling Portfolio Business Plan.

Application 17-01-013
(Filed January 17, 2017)

And Related Matters

Application 17-01-014
Application 17-01-015
Application 17-01-016
Application 17-01-017

**COMMENTS OF THE INSTITUTE OF HEATING AND AIR CONDITIONING
INDUSTRIES ON PROPOSED DECISION ADDRESSING WORKFORCE
REQUIREMENTS AND THIRD-PARTY CONTRACT TERMS AND CONDITIONS**

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Dated: September 27, 2018

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I. Introduction

The Institute of Heating and Air Conditioning Industries respectfully submits our comments on the Proposed Decision Addressing Workforce Requirements (Proposed Decision) in the Energy Efficiency Rolling Portfolio Business Plans Proceeding (A.17-01-013 et al) pursuant to Rule 14.3 of the California Public Utilities Commission’s (CPUC or Commission) Rules of Practice and Procedure.

II. Comments

IHACI observes that in Comment’s filed by parties in this week’s filing period, a range of ideas have been advanced to increase the focus on traditional apprenticeship programs; skilled and trained workforce provisions reflective of those requirements; and from other commentators, respect for the training modalities which exist independent of those options. We further note that

substantial questions have been raised as to threshold project size requirements, caps or exclusions and argue for further study by the CPUC in this area before any next steps, including adoption of Workforce Requirements, especially as they are tied to unworkable monetary tier levels detached from project cost data that provides verisimilitude as to their setting.

Because workforce regulations are quasi legislative in nature worker rather than worksite in nature, the greater wisdom lies in the caution of further analysis and hearings for a fuller establishment of a workable schema. For example, a threshold of a \$200,000 cost project has the potential for sweeping up much of the commercial and residential private sector work involving HVAC without any assurance that a verifiable workforce exists to perform that work. A metric of an incentive of more or less than \$500 would require magical thinking to enforce. The analytical point of greatest regulatory concern is the weak point of verifiable processes for such a workforce, more than the goal of having one.

III. Background on IHACI

IHACI's diversified membership base, which includes all facets of the HVAC industry (contractors, manufacturers, distributors, utilities, associates, and affiliates), uniquely motivates IHACI to volunteer its expertise on the necessary training programs for each element of the affected communities, workers, contractors, manufacturers, end-users and local regulators. IHACI's training classes are co-sponsored and currently offered with: Pacific Gas & Electric; San Diego Gas and Electric; Southern California Edison; and Southern California Gas Company. In 2017, approximately 14,000 students attended IHACI/IOU training classes. As a result of this statewide collaboration, training is consistent and uniform.

IHACI's training curriculum is accredited through the California Community College Chancellor's office, allowing students to partake of college credit opportunities. To our

knowledge, this is the first time such collaboration has been established between an industry non-profit (IHACI); the California Community College Chancellor's Office (Glendale Community College); and the Investor Owned Utilities.

We are honored to participate in this process and provide these comments.

Respectfully submitted,

ATKINSON, ANDELSON, LOYA, RUUD & ROMO

By: */s/ Robert Fried*

ROBERT FRIED

Attorneys for
INSTITUTE OF HEATING AND AIR
CONDITIONING INDUSTRIES

Dated: September 27, 2018