



BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

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Application of Southern California Edison Company (U338E) for Approval of its 2012- 2014 California Alternate Rates for Energy (CARE) and Energy Savings Assistance Programs and Budgets. And Related Matters

Application 11-05-017
(Filed May 16, 2011)

Application 11-05-018
Application 11-05-019
Application 11-05-020

GREEN FOR ALL WRITTEN OPENING COMMENTS TO THE PROPOSED DECISION

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This reply testimony, prepared by Katherine Daniel, Communities of Practice Program Manager at Green For All, provides comment on testimony addressing Workforce Education and Training (WE&T) issues and the multifamily residential service program proposals submitted by other parties participating in the Proceedings to Approve the California Alternate Rates for Energy (CARE) and Energy Savings Assistance Program (ESAP) and Budgets.

Green For All respects the commitment that the Commission and the IOUs have placed on achieving economic development in the communities in which they serve. We have participated in these proceedings as an advocate for communities depending on the green economy to provide pathways out of poverty and hope to continue to contribute examples and best practices of how our common goals can best be achieved.

Response to Workforce Education and Training Recommendations

Green For All applauds the Proposed Decisions (PD) proposal that the IOUs “immediately begin collecting...data in six WE&T areas.”¹ in order to assess their progress towards meeting the ESA Program needs for the next three cycles with the seven particular focuses described in the PD² as well as “manage its current and anticipated workforce needs and effectuate added social benefits of creating and/or supporting employment for minority, low-income, and other

¹ PD p. 154

² PD p. 153

disadvantaged communities with the skills necessary to meet the ESA Program needs.”³.

Include Demographic Data in the IOUs WE&T Data Tracking Requirement

We believe that this recommendation goes a long way towards making the nexus between quality of training and quality of services delivered to ESA program participants apparent while collecting essential information about the quality of the opportunities the program provides to its workforce and how that affects the quality of the program. Further, we agree with the PDs affirmation that “as a program funded entirely by ratepayers, the IOUs’ ESA Program-specific WE&T plan for the remaining three cycles creates potential opportunities for job creation, incubation, or development for displaced and disadvantaged workers.”⁴ This being the case, it seems necessary then, that the Commission require that the utilities track demographic and other pertinent information related to determining how many and what kind of opportunities are in fact being offered to displaced and disadvantaged workers, in addition to the six WE&T areas described in the PD. We urge the Commission to consider adding demographic data to the information the utilities are directed to collect and track on an ongoing basis.

With this information, the utilities will be better able to achieve the goals of the long-term strategic plan to provide opportunities for disadvantaged workers by better integrating the ESA program with other energy efficiency services. The

³ PD p. 154

⁴ PD p. 152

Commission directly addresses this goal in the PD by directing the utilities to consider ESA Program participants a potential pool of easily identifiable disadvantaged workers and incorporate them into the Sector Strategy approach the utilities identified within their general energy efficiency programs.⁵ Green For All supports the ongoing efforts to integrate the ESA workforce with other energy efficiency programs in order to establish a more direct career pipeline for disadvantaged workers. In order to do this effectively however it is important that the utilities continuously gather information about the workers that are receiving opportunities through the ESA program and how they are moving into other efficiency programs. Without demographic data, it is difficult to track progress towards accomplishing this goal.

Offer Guidance for the Composition and Process for Implementing WE&T Working Group Recommendations

Finally, Green For All agrees that the formation of a WE&T working group to analyze the data collected by the utilities and make recommendations for refinements to improve the design, administration, delivery, and ultimate success of these programs is an appropriate approach for evaluating and strengthening the program to advance the goals of the strategic plan.⁶ However, we urge the Commission to elaborate further on the process for forming that working group and the process for implementing the working groups recommendations. In order for the working group to be representative and effective, it must have broad representation from the range of stakeholders

⁵ PD p. 156

⁶ PD p. 10

involved in achieving WE&T goals. We encourage the commission to require such a broad spectrum of participants in the working group, including representatives from training providers, labor, contractors, workforce development organizations, and advocacy groups in addition to utility representatives. Further it is Important that there is a clear requirement that utilities are accountable to achieving the recommendations that the working group sets forth and we ask the Commission to make this accountability explicit as well as offering guidance on the process for the utilities to incorporate and implement the recommendations of the working group.

Responses to the Recommendations Pertaining to Multifamily

In addition to Green For All's commitment to ensuring that the wealth of opportunities created by the ESA program are made available to disadvantaged workers to the greatest extent possible, we acknowledge the program's beneficial impact on low-income families receiving services, particularly in light of the vision set forth In D.07-12-051 and the Strategic Plan, that "by 2020, 100 percent of eligible and willing customers will have received all cost-effective [Energy Savings Assistance Program] ... measures."⁷

Adopt Expedited Enrollment of Low-income Multifamily Buildings

In order to achieve this goal, the delivery of services to multifamily properties is essential and we ask that the Commission reconsider the PDs proposal not to adopt expedited enrollment of HUD certified low-income properties. These

⁷ California Public Utilities Commission. September 2008. *California's Long Term Energy Efficiency Strategic Plan*. Section 2. Page 25.

properties serve low-income families by definition, and allowing expedited enrollment of such buildings increases the number of income-eligible multifamily tenants served by the ESA Program while establishing a building-level approach to enrollment that reduces administrative expense.

Expedited enrollment has already been approved and operated by the California Department of Community Services and Development (CSD) and the federal Department of Energy (DOE) in the context of the Weatherization Assistance Program (WAP), which serve many of the same low-income customers and by adopting the same practices the ESA Program can better integrate and build upon the success of these programs. Further, DOE has already established mechanisms to establish income qualification for low income, multifamily buildings, which the ESA Program can adopt with little additional effort.

Lift the Prohibition for Upgrading Heating and Hot Water in Multifamily Buildings

Green For All urges the Commission to re-consider the decision that “no furnace repair and replacement or hot water repair and replacement work shall occur in violation of our holding in D. 07-12-051 that heating and water heating in rented housing are the responsibility of the landlord.”⁸

These prior ESA program decisions, relying on outdated and inaccurate information, have explicitly excluded improvements to heating and hot water

⁸ D. 08-11-031 p. 31

systems in multifamily rental housing. Yet, these improvements directly and primarily benefit the tenants of multifamily buildings and excluding them from ESA eligible services to eligible multifamily rental housing is antithetical to the Strategic Plan goal that “the ESA Program will be an energy resource by delivering increasingly cost-effective and longer-term savings.”⁹

This ban is a significant roadblock to achieving long-term energy savings in 100% of the homes of low-income people by 2020 as well as a barrier to achieving the strategic plan’s vision for delivering increasingly more comprehensive energy efficiency upgrades¹⁰ and achieving the greater energy savings associated with this approach. As such, it serves to limit the benefit that low-income residents in multi-family buildings can receive as well as unnecessarily capping the extent of the work that can be performed in the program. This reduces the creation of skilled job opportunities and decreases progress towards the utilities’ workforce education and training objectives and we urge the Commission to lift an outdated and unnecessary restriction.

Conclusion

Green For All strongly support the intent and plan to advance WE&T goals and access to energy efficiency services by low-income consumers through the ESA Program that the Proposed Decision describes. We believe the findings above justify program improvement recommendations and that taken together, Green

⁹ California Public Utilities Commission. September 2008. *California’s Long Term Energy Efficiency Strategic Plan*. Section 2. Page. 28.

¹⁰ California Public Utilities Commission. September 2008. *California’s Long Term Energy Efficiency Strategic Plan*. Section 2. Page 18.

For All's recommendations further the goals stated in the Strategic Plan to better serve low-income communities, as well as creating meaningful job opportunities in the very communities that are served by the ESA Program. In order to fulfill the Strategic Plan, and promote WE&T goals, we urge the commission to adopt the above recommendations.

Dated May 24, 2012

Respectfully,

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