

**PACIFIC GAS AND ELECTRIC COMPANY**  
**Energy Efficiency 2018-2025 Rolling Portfolio Business Plan**  
**Application 17-01-015**  
**Data Response**

PG&E Data Request No.:	CCEE_001-Q12		
PG&E File Name:	EnergyEfficiency2018-2025-RollingPortfolioBusinessPlan_DR_CCEE_001-Q12		
Request Date:	March 22, 2017	Requester DR No.:	001
Date Sent:	April 7, 2017	Requesting Party:	California Coalition for Energy Efficiency
		Requester:	Thomas A. Enslow

**SUBJECT: APPLICATION OF SOUTHERN CALIFORNIA EDISON COMPANY (U338E) FOR APPROVAL OF ENERGY EFFICIENCY ROLLING PORTFOLIO BUSINESS PLAN AND RELATED MATTERS. CCE-DR01**

**QUESTION 12**

PG&E’s 2018-2025 Energy Efficiency Rolling Portfolio Business Plan states that detailed workforce standards will be required for “specific programs” as “applicable” and that implementation plans will “consider the appropriate workforce standard requirements, such as any required certifications, minimum performance standards, or pre-qualification process for specific programs in support of its energy efficiency portfolio.”<sup>4</sup>

- (a) Please define the following terms in the context of the above strategy: (i) “specific programs”; (ii) “as applicable”; and (iii) “appropriate workforce standards.”
- (b) Under this requirement, will each energy efficiency program be required to identify the minimum knowledge, skills and abilities (KSAs) necessary to ensure quality installation of the ratepayer-subsidized energy efficiency measure?
- (c) Does this requirement mean that workforce skills, training, certification or qualification standards appropriate and applicable for the proper installation of the energy efficiency measure will be required for each program or does this mean that workforce standards will only be required for certain specific programs if workforce standards are determined appropriate and applicable? If it is the latter, how will “appropriateness and applicability be determined? If this will only apply to “specific programs,” how will PG&E determine which specific programs this will be subject to this requirement?

---

<sup>4</sup> PG&E 2018-2025 Energy Efficiency Rolling Portfolio Business Plan, Residential chapter at p. 50, Commercial chapter at p. 56, Public chapter at p. 39.

- (d) Under this requirement, are the recommendations contained in the DVC Workforce Guidance Plan considered appropriate and applicable workforce standards? The DVC Workforce Guidance Plan identifies approaches in addition to certification that are likely to result in better workforce quality, including (1) prevailing wage requirements for certain projects – so that contractors that invest in a skilled and trained workforce won't be out-bid solely based on the cheap labor costs of contractors who do not invest in a skilled and trained workforce; and (2) skilled workforce prequalification requirements based on requiring jobsite workers to be comprised of a certain percentage of journey persons or apprentices from a registered apprenticeship program. Are these additional strategies to be included in the suite of options that a program may require to address workforce quality?
- (e) What is meant by “minimum performance standards” and how is that different from current code and installation requirements? How would compliance with minimum performance standards be verified or enforced? Please provide any documents, data, reports or other evidence on which this strategy is based.

## **ANSWER 12**

(a) Definitions for the requested terms are provided below:

- “Specific programs”: Specific programs for which detailed workforce standards are appropriate, feasible, cost effective and support program goals may choose to implement workforce standards. In D.16-08-019, the Commission transitioned the majority of program proposals and design to third parties. Third party program proposals may include workforce standards should third parties determine they are necessary to support program goals and objectives. Not all programs will require detailed workforce standards.
- “as applicable”: Workforce standards will be incorporated into EE programs only when applicable and appropriate.
- “appropriate workforce standards”: As defined in the Business Plan, workforce standard requirements might include items such as required certifications, minimum performance standards, or pre-qualification processes. Program designers may include the appropriate workforce standards to meet program goals and objectives.

(b) No. Should a specific energy efficiency program choose to identify KSAs, they will have the opportunity to do so in the program Implementation Plan.

(c) Workforce standards will only be required for certain programs if workforce standards are determined appropriate and applicable. Appropriateness and applicability will be determined within the program Implementation Plan, and is outside of the scope of the energy efficiency business plan.

(d) The DVC Workforce Guidance Plan recommendations are a potential source of strategies for programs that seek to incorporate appropriate workforce standards, in consideration of program cost effectiveness and program objectives.

(e) Minimum performance standards include current code and installation requirements and equipment specifications. PG&E's program manuals are publicly available on the

California Energy Data and Reporting System (CEDARS) website and contain relevant information regarding minimum performance standards and QA/QC procedures.

To access the manuals:

1. Go to <https://cedars.sound-data.com/>
2. Select “Filings”
3. Within “Filings”, select “Programs”
4. Scroll or Ctrl-F to find the specific program.
5. Select the Program.

Select “View” under “Program Manual”