Decision 18-10-008 October 11, 2018 (Issued 10/22/18)

DECISION ADDRESSING WORKFORCE REQUIREMENTS AND THIRD-PARTY CONTRACT TERMS AND CONDITIONS

[Excerpts related to CAEECC for discussion at 2/28 Full Quarterly CAEECC Mtg.]

p.14 (2.1 General Applicability of Workforce Standards)

CEE and ORA/Cal PA also suggested in comments on the proposed decision various ways in which the Commission could consider evaluating the success of the workforce standards included in this decision. In particular, CEE suggested requesting that the California Energy Efficiency Coordinating Council (CAEECC) initiate a stakeholder process to discuss and vet the potential for further application of workforce standards adopted in this decision, or others in the future. We agree with this idea and will ask that CAEECC convene a stakeholder process, no later than July 1, 2020, to consider further application of workforce standards beyond those adopted in this decision. This will allow time for consideration of experience with the standards required herein. If consensus is reached on further application and/or additional standards, any of the PAs may bring us a proposal by no later than January 31, 2021, for further consideration in any appropriate energy efficiency rulemaking proceeding or business plan application proceeding that is open at that time.

pp. 23-24 (2.3.1. Certification Provider)

Based on the representations of numerous contractors and organizations, it appears as though the CALCTP certification is widely respected and accepted as an appropriate certification credential for lighting controls. We would like to be able to broaden the requirements to include multiple training and certification programs. However, it appears as though the other recommendations are not exactly on point for our purposes at this time. The NLCAA certification appears to apply to acceptance testing only, and not installation of lighting controls. The other recommendations, including manufacturer-based certifications, are likely not as rigorous as the standards offered by CALCTP.

Thus, for now, we will limit the requirements to the CALCTP certification, since we are still only applying the requirements to large projects. Should other certifications become more widely available, we will consider them in the future and/or look to the requirements that the CEC may consider appropriate as part of the responsible contractor policy under development in response to SB 350. The CEC's acceptance testing requirements may be the appropriate model for us to utilize in the future as we apply workforce requirements to larger numbers of projects over time. We will look to the CEC's responsible contractor policy as a guide in the future. In the meantime, if a program administrator becomes aware of a certification program with characteristics comparable to CALCTP (not including manufacturer-specific certifications or training programs), they may file a Tier 2 advice letter seeking to add a new certification or training provider to this standard. We also request that, prior to a PA submitting the advice letter

that the CAEECC convene a stakeholder discussion about the proposed new certification for lighting controls.

p.63 (5. Other Issues…)

ORA, now Cal PA, suggests that the Commission should set a timetable for evaluation of greater application of the workforce standards to residential projects and a quick mechanism to make this application operational relatively easily through an advice letter filing. CEE specifically suggests that the CAEECC be tasked with convening stakeholders, to discuss and vet further application of workforce standards. This suggestion is logical and we have implemented it in the text of the decision. We request that CAEECC begin discussion, no later than July 1, 2020, of possible further application of workforce standards beyond those adopted in this decision, after due consideration of parties’ experiences with implementation of the standards required herein. If consensus is reached on further application and/or additional standards, any of the PAs may bring us a proposal by no later than January 31, 2021, for further consideration in any appropriate energy efficiency rulemaking proceeding or business plan application proceeding that is open at that time. We do not adopt the ORA suggestion for an advice letter process, however, as these issues are complex and we prefer consideration in a formal proceeding venue.

p.69 (7. Assignment of Proceeding, Findings of Fact)

11. It is reasonable to ask the CAEECC to convene a stakeholder discussion by no later than July 1, 2020 to discuss the experience to date with the implementation of the workforce standards in this decision and whether or not these or additional standards should be extended to other types of programs or projects.

pp.72-73 (7. Assignment of Proceeding, Conclusions of Law)

14. Program administrators should be authorized to file a Tier 2 advice letter to propose to add lighting controls certification providers in the future in addition to CALCTP, as long as the certification program has characteristics equivalent to CALCTP (such as, not manufacturer-specific). It is reasonable to request that the CAEECC convene a stakeholder discussion about any additional lighting controls certification to be proposed prior the an (sic) advice letter being filed.

15. The Commission should request that the CAEECC convene a stakeholder process no later than July 1, 2020 to discuss experience with implementation of the workforce standards and the potential to extend these or new standards to additional programs or projects. If consensus is reached, any PA is invited to make an additional proposal to the Commission by no later than January 1, 2021.