



California Energy Commission
DOCKETED
12-EPIC-01
TN # 66833
AUG 17 2012

Date: August 17, 2012
Attention: California Energy Commission
RE: Re: Docket No. 12-EPIC-01 – Written comments on development of the Energy Commission EPIC investment plan

BACKGROUND: LA COOPERATIVA DE CAMPESINA

La Cooperativa Campesina California is a statewide association of rural service providers implementing Workforce Investment Act Title I Section 167 and CSBG farmworker service programs. Other community services include: rural emergency services, hard-to-reach outreach/education programs, LIHEAP, WAP and statewide communication projects that are in-language and in-culture. La Cooperativa is a California 501 c (3) corporation, and the Board of Directors consists of representatives from member agencies across California and the Employment Development Department (EDD).

The La Cooperativa infrastructure and capability include: Eight-Five (85) service and access sites primarily in California’s agricultural counties providing farmworker and rural outreach capability, diverse workforce training, self-sufficiency services, job placement and emergency services (partial services list). This comprehensive service delivery model utilizes a one-stop shop service center concept aiding collaboration, leveraging and cost-effectiveness.

Training services include ESL, GED, adult and family literacy, basic education, vocational education, and employer based training. Related services such as childcare, transportation, emergency services, housing, counseling, job placement, and follow up services enhance these training efforts.

Comments regarding Docket No. 12-EPIC-01: La Cooperativa Campesina offers it support for the general guidelines as outlined in Rulemaking 11-10-003 and provides specific comments in regard to the following:



The rulemaking states: “Economic Development – Supported activities should benefit the California economy to the greatest extent practicable. Given the profound economic challenges the state currently faces, it is incumbent upon the Commission to seek to maximize the economic benefits that accrue to California as a result of any ratepayer-funded activities.”

La Cooperativa strongly supports both the language and the spirit of this language; we would suggest detailed language in the FINAL Rulemaking that would also delineate economic benefit, goals and outcomes given an evolving and sustainable renewable industry and the impacts that it would have on California’s economy.

La Cooperativa understands that the final decision on EPIC is forthcoming; however, we strongly believe that this opportunity to assist rural communities with combating high unemployment and poverty is unprecedented in regards to investment given jobs and community economic benefit.

As a statewide network of rural community and workforce services providers, La Cooperativa de Campesina is ideally located in the heart of regions where renewable investment is at historic levels. La Cooperativa can say without equivocation that the current demand for trained and certified workers in constructing the renewable generation facilities far outstrips its ability and the resources available via traditional means of job training to provide those trained workers this industry needs. These employment opportunities are in the here and now, and given the backlog of permitting in our service regions and the cottage industries that are sure to flourish, La Cooperativa can also say and prove these jobs are sustainable.

SDG&E disagrees that economic and/or workforce development should be a key principle for EPIC, stating that “workforce and economic development will happen organically as part of RD&D and renewable programs...which should not take the



focus away from the prime directive of ensuring direct benefits to our electric consumers.”

La Cooperativa supports SDG&E’s position of ensuring direct benefits to their consumers given EPIC, however, La Cooperativa would also say that good jobs generated by the energy industry does provide benefits to the IOU’s consumers and the communities in which they reside.

La Cooperativa proposes a “Needs Analysis” of California regions that would both quantify and qualify sustainable employment in the development of renewable facilities in the hardest hit regions in California impacted by high unemployment and poverty while at the same time being locales for renewable generation development projects.

La Cooperativa supports the Black Economic Council recommendations with regard to “specific attention be given to Light Emitting Diodes (LEDs) as they believe this technology can provide significant benefits to the low income community if its initial costs can be reduced.”

“The Efficiency Council is also generally supportive, but requests that it be made clear that all types of energy efficiency innovations be eligible for funding, including technologies, but also strategies and “methods of approach.”

We [La Cooperativa] agree that non-profit energy efficiency service providers that wear the dual hat of WE&T and successfully place trained workers in the renewable energy industry be a fundamental part of planning and program execution.

CFC and SDG&E agree with the staff proposal not to provide funding toward generalized outreach and education on renewable. Meanwhile, the Black Economic



Council et al. argues the opposite: that community outreach and education is essential to enable deployment of new technologies, especially in underserved communities. They [Black Economic Council et al.] also recommend that the workforce development funding amount be increased from \$2 million annually to at least \$14 million annually, citing a number of reports and articles highlighting the decline in funding and opportunities for low-income individuals to receive training to become qualified for green jobs.

La Cooperativa agrees, and strongly supports the WE&T funding increase from \$2million to at least \$14 million annually.

Stakeholder Consultation: The staff proposal included a recommendation that the EPIC administrator(s) be required to conduct scoping workshops and consult with key stakeholders to provide strategic and technical advice and feedback on the investment plans and their implementation, and any other aspects of the program. More specifically, staff recommended that stakeholder consultation be convened by the administrator(s) periodically, no less than twice a year.

The staff proposal listed a number of key stakeholders, including:

- **Members of the Legislature, to the extent their participation is not incompatible with their Legislative positions;**
- **Government, including state and local agency representatives;**
- **Utilities;**
- **Investors;**
- **California Independent System Operator;**
- **Consumer groups;**
- **Environmental organizations; and**
- **Academics**



“The Efficiency Council supports formal and informal stakeholder consultation, and would like to have the energy efficiency industry included in the list of stakeholders.”

La Cooperativa agrees that the inclusion of entities that work in and for the energy industry makes sense in as much as it edifies ALL stakeholders; raises issues of economic opportunity and sustainability, and if entities for inclusion as an EPIC stakeholder also are non-profit and represent community oriented, comprehensive energy services delivery, that benefit to the overall EPIC process is exponential.

In closing, La Cooperativa Campesina apologizes for its belated entry into this most important discussion on the topic of EPIC and we look forward to further engaging in the process as it moves forward.

Dated; August 17, 2012

Respectfully submitted,

By: _____/s/_____

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