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August 13, 2015

California Air Resources Board Sacramento, California

Re: Comments on Draft of Cap-and-Trade Auction Proceeds-Second Investment Plan

Rising Sun Energy Center is a 501(c)3 non-profit organization and leading green workforce development and residential efficiency services organization. With a focus on under-served populations, Rising Sun provides youth and marginalized adults with meaningful training and employment opportunities in the growing construction, energy efficiency, and solar sectors, while delivering no-cost energy upgrades to thousands of households each year. **Rising Sun's mission is to empower individuals to achieve environmental and economic sustainability for themselves and their communities**.

Rising Sun agrees that significant investment is needed in renewable energy and energy efficiency to achieve the state's energy use and carbon emissions reduction goals and that there is significant opportunity for energy savings at the water-energy nexus. It is also imperative that two additional strategies be incorporated into the spending plan:

- Investment in workforce development programs targeting jobs created by support for energy efficiency and renewable energy program and projects, with a particular focus on green career pathways for residents of disadvantaged communities.
- Investment in an innovation fund to support new ideas and strategies that achieve broader community based impacts, particularly in disadvantaged communities. This investment should support projects that take an integrated approach to achieving savings at the water-energy nexus while creating jobs locally.

Given that the overall goal is to reduce greenhouse gas emissions, there is a growing need for a trained workforce to fill the skills gap in the energy efficiency and clean energy industry sectors and related occupations. To ensure that Cap-and-Trade investments help create energy-related career pathways, it is very important to include funding for community based workforce development organizations offering vocational training for construction and energy careers. Workforce development funds should particularly target organizations that serve residents of low-income and disadvantaged communities, and that provide strong case management and job placement assistance. Such investments will ensure that Cap-and-Trade funds support both environmental and economic sustainability.

In order to reach the ambitious goals laid out in AB32, Cap-and-Trade funds need to diversify beyond business as usual and support new and innovative strategies. A competitive and

transparent process should be created to fund projects through innovation grants. The goal of this innovation fund should be twofold: To support existing successful local projects with potential for scale, as well as supporting new projects that take a community based approach. The emphasis of the innovation fund should be projects that embody true sustainability through the integration of energy and water use reduction, renewable energy generation, job creation, and community economic benefits.

An example of the type of project the innovation fund might support and bring to scale is Rising Sun Energy Center's California Youth Energy Services (CYES) program. CYES is a youth employment and resource efficiency retrofit program that hires young people (15-22 years of age) and trains them to become Energy Specialists, serving their communities with FREE Green House Calls. Energy Specialists install free energy and water saving devices, and provide personalized recommendations and education for further savings. CYES provides services to all community members regardless of income. However, it focuses on hard-to-reach residents including renters, multi-unit dwellings, non-English speaking households, and low-moderate income households. CYES provides youth with opportunities for training and meaningful employment while saving residents money on their utility bills.

We strongly urge you to integrate these two components into the spending plan.

Thank you for your consideration.

Sincerely,

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Jodi Pincus, Executive Director Rising Sun Energy Center