December 5, 2022

Via Electronic Submission

Environmental Protection Agency
1200 Pennsylvania Avenue, N.W.
Washington, DC 20460

RE: Comments Pertaining to No EPA-HQ-OA-2022-0859, Request for Information on the Greenhouse Gas Reduction Fund

The American Council on Renewable Energy ("ACORE")[1] appreciates the opportunity to submit the following comments in response to the request for public comment on the Environmental Protection Agency's ("EPA") *Request for Information on the Greenhouse Gas Reduction Fund*.

An August 2022 study by AFL-CIO and the Energy Futures Initiatives found that the Inflation Reduction Act ("IRA") will "add nearly 1.5 million jobs and $250 billion to the economy by 2030, increase per capita personal income by several thousand dollars, reduce greenhouse gas emissions by nearly 40%, and decrease overall energy use through energy efficiency and innovation." The IRA will add these jobs to an already rapidly growing clean energy sector forecasted to increase by a staggering 14.8 million jobs by 2030 from 2021 levels.[2]

Prior to the passage of the IRA, the industry forecasted labor supply shortages in clean energy, specifically amongst wind turbine service technicians, solar photovoltaic installers, semiconductor processing jobs, structural metal fabricators and fitters, electricians, and electrician helpers. According to the 2021 Clean Energy Labor Supply Study, if the grid reaches between 50-70% clean energy penetration, the US will fall short of wind turbine technician jobs by roughly 60% and solar photovoltaic installer jobs by roughly 20%.[3] Meanwhile, a new National Renewable Energy Laboratory report found that already, 68% of wind energy employers have faced difficulties finding qualified applicants.[4]

While the IRA contains new prevailing wage and apprenticeship requirements for the construction of clean energy projects, the legislation does not provide subsequent funding for workforce development or training activities. To meet our U.S. 2030 Greenhouse Gas Pollution

[1] ACORE is a 501(c)(3) national non-profit organization that unites finance, policy, and technology to accelerate the transition to a renewable energy economy. Founded in 2001, ACORE has seen the deployment of over 260 GW of renewable energy and investment of approximately $600B. ACORE Members are responsible for over two-thirds of annual US renewable energy capacity growth.
[2] "Inflation Reduction Act Analysis: Key Findings on Jobs, Inflation, and GDP," Energy Futures Initiative & AFL-CIO, August 2022.
[3] "Clean Energy Labor Supply Study," BW Research Partnership, June 2021.
[4] "Defining Wind Energy Experience," NREL. October 2022.

Reduction Goals and realize the full economic development potential of the law, a diverse, well trained, and universally certified workforce is required. Specifically, the Clean Energy Labor Supply Study highlights the need for training program development and active partnerships across educational institutions, unions, non-profits, and other training providers like private companies. A shortage of qualified labor will prevent projects being deployed at the speed and scale required to meet our emissions targets.

ACORE therefore urges the EPA to consider workforce development activities as qualified projects that "assist communities in the efforts of communities to reduce or avoid greenhouse gas emissions and other forms of air pollution," as defined in Section 134(c)(3). Further, ACORE urges that coalitions and organizations working to develop standardized workforce development and clean energy training programs be considered eligible recipients, as defined by Section 134(c)(1).

Addressing the reduction of greenhouse emissions from a workforce lens will amplify the vulnerability of disadvantaged communities as they often bear disproportionately greater environmental and socioeconomic burdens as well as the legacies of racial and ethnic discrimination. By awarding funding to coalitions and other organizations focused on collaboratively implementing equitable short- and long-range solutions to address our nation's clean energy workforce crisis, the EPA will inherently spark an unprecedented movement toward resolving our clean energy workforce crisis while delivering the restorative environmental, economic, and social justice focused solutions to communities previously left behind, in reaping the benefits of our clean energy transition.

Because the solutions to climate change and workforce development stand at the intersection of fostering both environmental and restorative social justice change, the Greenhouse Gas Reduction Fund ("Fund") represents a critical opportunity to direct public funding toward public-private clean energy workforce coalitions and organizations working together to build-out a safe and ready workforce by leveraging systemically equitable strategies. Further, the Fund can benefit disadvantaged communities by strategically deploying the $15 billion earmarked for low-income areas to ensure disadvantaged communities can be active participants in the clean energy transition.

RFI QUESTIONS:

Section 1: Low-Income and Disadvantaged Communities

1. **What should EPA consider when defining "low income" and "disadvantaged" communities for purposes of this program? What elements from existing definitions, criteria, screening tools, etc., - in federal programs or otherwise - should EPA consider when prioritizing low-income and disadvantaged communities for greenhouse gas and other air pollution reducing projects?**

We urge the EPA to encourage the White House and Department of Energy (DOE) to more closely align the methodologies used in the creation of the Climate and Economic Justice

screening tool (WH J40 website) and DOE Economic Justice screening tool to provide more concrete and consistent guidance in determining eligibility as a disadvantaged community.

EPA should consider incorporating the definition of "energy community" from the IRA and Justice 40 definition of disadvantaged community when outlining the criteria for a community to be considered disadvantaged. The IRA has a special focus on alleviating the burden of the energy transition by incentivizing clean energy development in communities formerly supported by fossil fuel economy. Through incorporation of this definition EPA will further the Fund's intention to reduce emissions while also supporting disadvantaged communities. The IRA defines an energy community as follows:

- A census tract or adjoining census tract in which a coal mine has closed after Dec 31, 1999.
- A census tract or adjoining census tract in which a coal-fired power plant unit has retired after Dec 31, 2009.
- A Brownfield (contaminated) site.
- A metropolitan/non-metropolitan statistical area which has (or had) 0.17% or greater direct employment related to extraction, processing, transport, or storage of coal, oil, or natural gas since 2000, and an unemployment rate at or above national average for the previous year.
- A metropolitan/non-metropolitan statistical area which has (or had) 25% or greater local tax revenues related to extraction, processing, transport, or storage of coal, oil, or natural gas since 2000, and an unemployment rate at or above national average for the previous year.

2. What kinds of technical and/or financial assistance should the Greenhouse Gas Reduction Fund grants facilitate to ensure that low-income and disadvantaged communities can participate in and benefit from the program?

One appropriate use of funds to specifically support low-income and disadvantaged communities would be financial and technical assistance for individuals to obtain baseline training to qualify for employment as a clean energy technician (including an opportunity to 'earn and learn' to ensure people from disadvantaged communities can obtain required training to embark on a new career with living wages and benefits). As a complement to this approach, financial assistance to support individual life balance needs (childcare, transportation, health care, mental health support services, etc.) through the training and first 6 months of employment should be considered.

In addition, we encourage the funding of coordinating bodies who are leveraging the Collective Impact approach, to ensure disadvantaged communities are actively engaged in coalition

decision making, implementation of solutions and determining the community benefit measures.[5] Similarly, individual organizations that adopt a collective impact approach can also pursue funds.

3. **What kinds of technical and/or financial assistance should the Greenhouse Gas Reduction Fund grant facilitate to support and/or prioritize businesses owned or led by members of low-income or disadvantaged communities?**

This fund should include:

- Incentives to support sustainable, coalition-coordinated initiatives, and organizations aimed at breaking down barriers for Black, Indigenous, and People of Color (BIPOC) owned business to successfully obtain funds for clean energy workforce development.
- Financial assistance and long-term funding support for initiatives aimed at supporting the building of capacity, networks, and mentoring of business owned by BIPOC entrepreneurs in clean energy.

Section 2: Program Design

1. **What should EPA consider in the design of the program to ensure Greenhouse Gas Reduction Fund grants facilitate high private-sector leverage (i.e., each dollar of federal funding mobilizes additional private funding)?**

Through administering Fund grants to workforce development programs, EPA is building a workforce ready for private industry to invest in. Funds administered in workforce development are then followed up with private industry employment when a clean energy trainee is hired.

Additionally, grants for workforce development require public-private partnership. Non-profits or educational institutions receiving grants can and will work with private industry through coalitions to provide standardized training for their workforce, including technical and safety training recognized as industry standard (for example the Global Wind Safety Organization (GWO) and the Solar Energy Industries Association (SEIA) safety standards).

Bringing together industry, education, and non-profits can be a powerful tool in building a clean energy workforce ready to serve greenhouse gas reducing projects. One example is the partnership between Women Building Futures, Lethbridge College, and Vestas. Women Building Futures (WBF) is a non-profit organization based in Alberta, Canada that specializes in programs and services that help unemployed and underemployed women connect to careers that pay above a living wage. Lethbridge College is a publicly funded community college in Alberta, Canada. Vestas is an onshore and offshore turbine manufacturer that also provides operations and maintenance on wind farms. In 2022, WBF, Lethbridge, and Vestas announced a new program to

[5] "Collective impact" is a network of community members, organizations, and institutions who advance equity by learning together, aligning, and integrating their actions to achieve population and systems level change.

train women as wind technicians through a 4-week course. The first class graduated 10 women who received an industry-recognized Level 1 Service Technician training, the majority of which were hired by Vestas and guaranteed 3-weeks of fully paid hands-on training and onboarding.

This model leveraged grant funding from the government of Alberta and industry funds to (1) integrate an industry-recognized wind energy technician training to an existing non-profit training program; (2) target recruitment of women—an under-represented population within the clean energy technician population; and (3) create a clear job pathway to a well-recognized employer of wind technicians.

2. **What federal, state and/or local programs, including other programs included in the Inflation Reduction Act and the Infrastructure Investment and Jobs Act or "Bipartisan Infrastructure Law," could EPA consider when designing the Greenhouse Gas Reduction Fund? How could such programs complement the funding available through the Greenhouse Gas Reduction Fund?**

The Fund can complement the tax credits for clean energy project developers and owners found in IRA by also ensuring there is a safe and ready workforce to operate anticipated clean energy build-out over the next decade.

In response to the general theme of program design, carbon-abated by funded activities should be considered to ensure greatest emission reduction per dollar invested. With regards to workforce development, the carbon abated from the clean energy projects, such as solar and wind farms, where technicians are deployed should be taken into consideration. The economic impact of these clean energy facilities can also be considered as they contribute to a hallmark of the IRA and the Infrastructure Investment and Jobs Act: job creation and economic development across the United States.

Section 3: Eligible Projects

1. **Beyond financial assistance for project financing what other supports – such as technical assistance -- are necessary to accelerate deployment of such projects?**

ACORE urges the EPA to consider activities related to curriculum and program development as eligible technical assistance.

In response to the general theme of "eligible projects," workforce development activities should be considered qualified projects that "assist communities in the efforts of communities to reduce or avoid greenhouse gas emissions and other forms of air pollution," as defined by the IRA.

Workforce development can be defined as, but is not limited to, work that:

- Furthers the creation or roll-out of accredited standardized safety and technical training for clean energy technologies.

- Funding for workforce training infrastructure, such as hiring teachers and purchasing training equipment.
- Funding that supports greater incentives for engaging clean energy companies owned by those from groups currently underrepresented in the clean energy supply chain.
- Funding for recruitment efforts that build a more diverse and inclusive workforce. Recruitment efforts can and should include marketing, communications, community outreach, and initiatives that remove barriers to training such as scholarships and earn and learn programs.
    - The 'earn and learn' model is one in which individuals receiving educational training are paid to do so. This model eliminates a common educational barrier of being unable to take time off from income-generating work in order to pursue a new professional skill. Earn and learn models can be deployed to build a diverse clean energy workforce.

Section 4: Eligible Recipients

1. **Who could be eligible entities and/or indirect recipients under the Greenhouse Gas Reduction Fund consistent with statutory requirements specified in section 134 of the Clean Air Act? Please provide a description of these types of entities and references regarding the total capital deployed by such entities into greenhouse gas and air pollution reducing projects.**

ACORE urges that coalitions, including those comprised of non-profits, vocational schools, and other stakeholders working to develop standardized workforce development and clean energy training and certification programs, as well as individual organizations such as those listed above, be considered eligible recipients, as defined by Section 134(c)(1). This includes, but is not limited to:

- Both national non-profits working with educational institutions to develop curriculums and job training programs, and local institutions such as community colleges and vocational schools implementing said programs.
- Organizations or coalitions that bring together various stakeholders, i.e., labor, environmental justice orgs, NGOs to further the aforementioned goal.
- Companies owned and operated by Black, Indigenous, and People of Color (BIPOC) clean energy entrepreneurs.
- Regional Economic Development offices and Consortiums.

Section 5: Oversight and Reporting

In response to the general theme of "oversight and reporting", the key reporting metrics for funds administered to workforce development can be inclusive of the following list:

- Number of certified clean energy graduates from training programs that receive funding either directly or indirectly through a non-profit, educational institution, public-private

partnership, etc. who go on to work at greenhouse gas reducing projects such as onshore and offshore wind farms, solar farms, energy storage facilities, hydro power facilities and advanced nuclear technologies.

- Percentage of clean energy graduates from said programs that identify as members of BIPOC communities.
- Percentage of clean energy graduates that identify as women.
- Percentage of clean energy graduates from disadvantaged communities as defined by the program (or as defined as the Justice 40 as proposed earlier in ACORE's comments).
- Commitments to hire recipients of clean energy training programs from for-profit employers in the clean energy industry.

Section 6: General Comments

1. **Do you have any other comments on the implementation of the Greenhouse Gas Reduction Fund?**

The EPA currently provides grant funding for workforce development activities in several areas, including through the Environmental Workforce and Job Training Program, Brownfields Job Training Program, and the new Innovative Water Infrastructure Workforce Development Program. Allocating funds to the creation of a clean energy workforce represents a logical next step in the Agency's efforts to protect human health and the environment. By leveraging existing institutional knowledge and established best practices, EPA can proactively address critical labor shortfalls and help ensure an educated, diverse workforce is ready to tackle the climate crisis at scale. EPA can also ensure that disadvantaged communities are able to access the jobs of tomorrow, and that fossil communities are able to participate in the ongoing energy transformation.

Thank you for the opportunity to submit these comments. Please do not hesitate to contact me, José Zayas, Executive Vice President of Policy and Programs, at Zayas@acore.org with any additional questions you may have.

Sincerely,

/s/

José Zayas
Executive Vice President of Policy and Programs