



Our Mission:
To coordinate a regional workforce
system that supports individual
prosperity and business
competitiveness.

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September 11, 2014

Oregon Public Utility Commission
3930 Fairview Industrial Dr SE
Salem, OR 97302-1166

PO Box 1088
Salem, OR 97308-1088

**RE: Second Round Comments -UM1622 Gas Cost Effectiveness
Measures**

Worksystems, Inc. is a non-profit agency that supports economic growth in the City of Portland, Multnomah and Washington counties by pursuing and investing resources to improve the quality of the workforce. We design and coordinate workforce development programs and services delivered through a network of partners to help people get the skills, training and education they need to go to work or to advance in their careers. Our partners include employers, labor groups, government, community colleges, high schools, community-based and economic development organizations. Since 1998, Worksystems has invested nearly \$300 million to improve the quality of our regional workforce.

Worksystems Inc. (WSI) offers the following preliminary comments on the issues associated with UM 1622 in advance of the September 30th public meeting. Thank you for this opportunity and for advancing this important discussion in the State of Oregon.

We are concerned about the current possibility that gas measure incentives for Oregon ratepayers may be eliminated. This would directly impact the level of demand for energy efficiency for residential customers and in turn impact the vibrancy of this industry. Good paying jobs will be lost, businesses will suffer, and workforce development opportunities will decline. Worksystems has specific experience with energy efficiency serving as an important entry point to the construction trades for jobseekers looking to gain experience in the field and move into a long-term construction career. Our past partnerships with energy efficiency have resulted in 88 unemployed individuals being connected to new jobs created by a blossoming industry. Many of these resulted in people finding meaningful career ladders in construction. These types of benefits should not be lost for Oregonians.

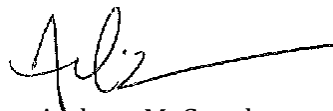
Since 2011, Worksystems has seen a dramatic increase in the demand for home energy efficiency professionals spurred in part by gas measure incentives. Many of the growth occupations are entry level and require only short-term or On-the-Job Training and have been accessible to our region's

underserved communities and individuals. Worksystems has worked with our community partners to promote energy efficiency as a viable construction career pathway. We've invested in training for individuals that has led to rapid entry into living wage jobs in this industry. These cuts would disproportionately hit jobseekers seeking pathways out of poverty, including people of color, women and veterans.

Additionally, it is concerning that the Oregon Public Utilities Commission (OPUC) bases their ongoing investments in energy efficiency with little to no workforce or wage standards. These standards include skills certification, contractor selection criteria, and compensation standards. They are common in other industries, including healthcare, architecture, engineering, and other construction fields and are effective in establishing a high bar for performance in a particular field. The energy efficiency industry, utility ratepayers, and Oregon communities could benefit from more rigorous training, wage, and utilization standards for activities where ratepayer funds are invested rather than a race to the bottom. It is important to consider all of this in the "cost effectiveness" discussion.

Worksystems realizes the complexity of this issue now before the OPUC. We offer these comments with the hope that this discussion will evolve toward an approach that best serves the interests of both the ratepayers and the working people of Oregon. We look forward to participating in that discourse.

Sincerely,

A handwritten signature in black ink, appearing to read 'A. McGough', with a long horizontal line extending to the right.

Andrew McGough
Executive Director
Worksystems, Inc.

