



March 20, 2024

Katrina Kessler, Commissioner
Minnesota Pollution Control Agency
520 Lafayette Road
Saint Paul, MN 55155

Subject: BlueGreen Alliance Support of the State Minnesota's CPRG Coalition Proposal for Equitable Residential Decarbonization (Award Number EPA-R-OAR-CPRGI-23-07)

Dear Commissioner Kessler,

The BlueGreen Alliance (BGA) unites America's labor unions and environmental organizations to solve today's environmental challenges in ways that create and maintain quality jobs and build a stronger, fairer economy. BGA plans to engage with the State of Minnesota, including the Minnesota Pollution Control Agency and other state agencies involved, to implement the suite of equitable residential decarbonization programs in your agency's proposal.

We are excited to have this proposal moving forward because we see the work of residential decarbonization happening most effectively as a collaboration between state and local governments with support from community-based groups, unions, and other stakeholders. It is our belief that local government connects more effectively with individual community members to move forward on individual implementation, while state government can more effectively provide backbone support and programming to foster learning and scale impact.

We also want better labor practices in the residential decarbonization space, including access to a union. Much of the necessary work—like insulation and HVAC—is done by small contractors that are currently nonunion and may be unfamiliar with meeting the Davis-Bacon prevailing wage requirements for any construction funded by the CPRG program. These Davis-Bacon requirements are vital to ensuring these are good-paying jobs that provide a pathway to a middle-class life for workers. High-road labor standards are key to maximizing energy efficiency investments to support and create good, union jobs. They are also better for our environment and ensure better outcomes. Studies have shown that poor installation of energy efficiency measures often results in energy savings losses of up to 50%.ⁱ

We anticipate participating in the proposed work through active engagement in developing and refining programming to effectively deliver on the purpose of ensuring low-income and disadvantaged communities are prioritized in the work of decarbonizing all homes in Minnesota. At a minimum, this means we will:

- Actively participate in the four annual convenings described in the proposal;
- Engage in the stakeholder-informed design process to help small residential decarbonization contractors comply with Davis-Bacon requirements and move toward high-road labor practices;

- Share information and resources from state and local government into the communities we serve to build awareness about programs and home decarbonization opportunities;
- Share information from the communities we serve to state program staff and relevant local government staff as part of program development and to improve programming and results over time; and/or
- Contribute in specific ways identified through our engagement with this process.

The BlueGreen Alliance is looking forward to engaging with the department on working on high-road labor standards in this industry. It fits with our view that workers should not have to choose between good-paying, safe jobs and a healthy environment.

Sincerely,

Abby Hornberger, Minnesota Policy Organizer, BlueGreen Alliance

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ⁱ Berkeley Labor Center, Workforce Issues and energy efficiency programs: A Plan for California Utilities, May 2014. <http://laborcenter.berkeley.edu/workforceissues-andenergy-efficiency-programs-a-plan-for-californias-utilities/>