August 26, 2019

Dear Dr. Hardin,

Thank you and the Department of Commerce for your commitment to dealing with climate change while creating jobs across North Carolina. The programs and policies the state implements in the next year are crucial to take full advantage of the state’s burgeoning clean energy marketplace to drive down greenhouse gas emissions and accelerate the state’s progress towards a clean economic future.

Below we provide comments on recommended changes to the draft *Clean Energy & Clean Transportation in NC: A Workforce Assessment* as well as policy recommendations the state should consider implementing as soon as possible. Here are our overall concerns:

- The definition used for Clean Energy should be limited to occupations that are truly clean and contribute to the goals of Executive Order 80 to address the impacts of climate change. These include renewables, energy efficiency, clean vehicles, battery storage, grid modernization and clean fuels. Jobs in industries that actually degrade our environment and contribute to climate change - such as woody biomass, waste-to-energy and non-cellulosic biofuel – should not be included as clean energy jobs.
- The report states incorrectly that there is a moratorium on offshore wind development in NC (page 30).
- While the report does a good job of noting the current level of clean energy jobs in North Carolina, it lacks much-needed analysis of job creation and potential workforce impacts of proposed policies in the clean energy plan. A recent E2 report on offshore wind, for instance, found that an average-sized offshore wind project in North Carolina could create more than 5,500 jobs and $251 million in wages.
- The assessment did not examine the workforce resulting from projects that make the state more resilient to the impacts of climate change. The National Institute of Building Sciences found that new construction that exceeds code to address flood, wind, wildfire, and earthquake could add 87,000 jobs across the nation, while only adding about 1 percent to new construction costs (NIBS, Natural Hazard Mitigation Saves, 2018, pgs 84-85). A detailed assessment of the implications for North Carolina could be quite beneficial to the state, especially given the recent losses the state sustained from Hurricanes Matthew and Florence.
- Your recommendations regarding other “clean economy” sectors leaves out important related sectors such as outdoor recreation & manufacturing, hemp, eco-tourism and resilient agriculture that can continue to support NC’s clean economy.

The following are steps North Carolina can take that would lead to more clean energy jobs in the state, while also attracting new investments in various industries from the Smoky Mountains to the Outer Banks. We strongly recommend the report include the following policy recommendations:
• The state should conduct a full market analysis of offshore wind’s potential to assess the potential economic, tax, wages, and employment benefits from increased offshore wind supply chain and development.
• Increase the state’s renewable energy portfolio standard, which currently is set to end in 2021, that would help create more solar and wind jobs.
• Establish a stand-alone energy efficiency resource standard that ramps up to two percent (of retail sales) and encourages more efficient use of North Carolina’s energy production and create new construction jobs in energy efficiency and manufacturing and other jobs in efficient lighting, appliances and equipment.
• Adopt a clean cars standard for North Carolina to increase low-emission and zero-emission vehicles and the jobs that come with those industries. The state should also join the Transportation Climate Initiative - a coalition of nine Northeast and mid-Atlantic states and the District of Columbia that have committed to developing a market-based policy to put a firm limit on transportation emissions.
• Establish a Green Bank in North Carolina. Green banks use funds to reduce the risk for private investment to support energy efficiency and clean energy, and provide capital for job-creating clean energy companies.
• Create programs to introduce more high school students to occupations in clean energy and create funding to help train clean energy workers at community colleges and other educational institutions. Nationally, 80 percent of clean energy employers report difficulty hiring qualified workers – a complaint we heard time and time again from clean energy companies at the recent Department of Commerce listening sessions that E2 helped organize.

Thank you again for your leadership in this important area, and we look forward to continuing to work with you and the NC Department of Commerce over the next year as the Clean Energy Plan is implemented.

Sincerely,

Bob Keefe
Executive Director
E2 (Environmental Entrepreneurs)

Ryan Miller
Executive Director
NC Building Performance Association

E2 (Environmental Entrepreneurs) is a national, nonpartisan group of business leaders, investors, and professionals from every sector of the economy who advocate for smart policies that are good for the economy and good for the environment. Our members have founded or funded more than 2,500 companies, created more than 600,000 jobs, and manage more than $100 billion in venture and private equity capital.

NCBPA is a not-for-profit 501(c)(6) trade association serving North Carolina’s building performance companies and professionals with education, member services and industry advocacy.