

UTILITY WORKERS UNION OF AMERICA

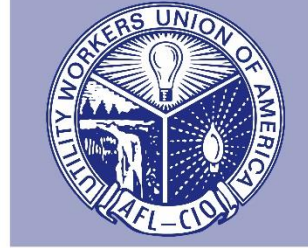
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August 9th, 2022

Dr. Briggs White, Deputy Executive Director
Energy Communities Interagency Working Group

VIA: <https://energycommunities.gov/comment>

Re: Request or Information to Inform the Interagency Working Group on Coal and Powerplant Communities and Economic Revitalization

Dr. White,

We welcome the opportunity to comment on the Interagency Working Group (IWG) Request for Information to Inform the Interagency Working Group on Coal and Powerplant Communities and Economic Revitalization (RFI). The Utility Workers Union of America (UWUA) represents approximately 45,000 workers in the electric, gas and water utility sectors. Our members maintain and operate utility infrastructure throughout the United States. The work our members do places them at the center of America's rapidly evolving energy systems – at the point of consumption in a gas or electric appliance and upstream all along the pipes and wires to the powerplants and industrial processes.

The UWUA supports reducing carbon emissions as our union is made up of technically minded people whose everyday work involves thinking like an engineer, a mechanic and a scientist. We clearly understand the need for the nation to manage its carbon emissions, that global climate change is real and that it is affecting the planet.

To date, however, thousands of UWUA members have involuntarily exited the fossil energy industry due to powerplant facility closures across the nation. As coal continues to become an ever-smaller percentage of America's energy mix, it has meant the steady loss of some of the best blue-collar jobs in the economy. It has also meant a steady de-unionization of the energy sector as coal-fired powerplants, at roughly 22% union density have for decades been well above the average U.S. union density of approximately 10% when taking into account both the public and private sectors.

The lived experience of these members had been that their jobs are literally irreplaceable in terms of wages, benefits, and ties to their communities. The reality is that many workers and their families have been involuntarily forced to exit their communities, places where their families have often lived for generations, in order to seek employment that even approaches the quality of the jobs lost. That the new jobs would almost certainly be non-union, given such low density in the broader economy, nearly goes without saying.

For these reasons, the UWUA has urged the federal government for many years to pay particular attention to these affected workforces as the energy sector rapidly evolves to utilize newer, cleaner technologies that employ far fewer workers on much less favorable terms. The reality is that new energy technologies, while often providing considerable numbers of jobs in construction and, occasionally, manufacturing to the degree that

components are made in the U.S., simply do not provide the same numbers or quality of place-based, community-centric jobs as the large powerplants that are being replaced.

Today, we thank you for the work done to date, but continue to urge the Administration to utilize the mechanisms of the IWG to more directly address the urgent needs of displaced fossil workers, their families, and their communities who continue to be left behind. Since a comprehensive congressional action aimed at a “high bar” approach to revitalizing energy communities and providing comprehensive direct assistance to affected workers to offset the wrenching realities of this nation’s energy transition is at this time for numerous reasons improbable, the UWUA urges the IWG to incorporate the following suggestions.

Integrated Support

Methods the Federal Government can take to reduce or eliminate barriers that prevent some energy communities from effectively accessing available funding and program support.

- Government agencies charged with accelerating the movement of funds to affected communities must continuously and proactively reach out to communities that may qualify for resources, rather than only putting out RFPs and hoping that communities will get word of the opportunities. Direct person-to-person contact from agencies to all community stakeholders – broadly defined – is the highest and best method of ensuring that the necessary, organic connections are being made up and down the chain.
 - Each relevant agency can build and deepen these local connections by assigning dedicated agency staff to conduct direct outreach to stakeholders in affected communities. Absent dedicated technical specialists – which very few communities possess - communities are usually wholly unaware of existing funding opportunities and will remain so unless the government engages in proactive outreach to as many points of contact as possible. To the degree that it doesn’t occur currently, the IWG should forward funding notices and resource information directly to county administrators where known plant or mine closures are to take place.
 - Developing this kind of organic, person-to-person structure can begin to build the soft infrastructure necessary to design and establish dedicated community hubs that could serve as one-stop shops for both communities and affected workers to identify and access federal opportunities and benefits. Relationships that are long-term and not project-by-project should be a primary focus. It has taken decades to build a local economy with fossil fuel being a core contributor. It will take years to diversify. Losing employment due to a plant or mine closure is of course a significant hardship, but so is the impact to local culture and family and community ties. The IWG’s “whole of government” approach should be focused on maintaining long-term resource relationships with an eye toward what works locally and how sustainable that is.
- The IWG should build on its initial outreach efforts to engage a much broader set of stakeholders, communities, and organizations in a sustained manner over time. Those groups who have been, or will become, most active on coal transition issues can act as ‘force multipliers’ by conducting their own outreach, bringing more affected individuals, community leaders, and stakeholders into the discussions. Worker and community resources and investments should be locally identified. There is no cookie cutter approach, or one-size-fits-all to providing assistance and resources. Local voices need to be integrated stakeholders and local benefits should be of focus.

Informational and technical assistance resources needed by energy communities to more easily access federal support.

- Local officials are often overloaded with multiple responsibilities and few staff and do not have capacity to find and apply for grants. Although similarly short on resources, trusted stakeholder organizations, broadly defined, working in collaboration with communities can help to fill in the gaps provided that, as

discussed above, the IWG is continuously building out the soft infrastructure of organic connections necessary to enable this approach

Models and examples the Interagency Working Group can consider as it works to establish a one-stop shop for energy communities to access the range of federal investments that can support community revitalization, job creation and energy workers.

- Proactive, comprehensive, person-to-person assistance has been achieved via government intervention to implement a hub for communities and workers to access federal resources in the context of military base closures. When community disruption and job shifting resulted from the 2005 Base Realignment and Closing Commission (BRAC), the Department of Defense proactively provided notice to communities of impending closures, provided personal counseling to affected workers, and set up hiring preferences for reemploying dislocated workers within other federal agencies, as well as identifying other federal resources available to those workers. The program was highly successful.¹ The key to success is not magical – it was simply the political commitment and funding levels that typically accompany the U.S. defense complex, but that also demonstrate what is actually necessary to achieve success at the worker level.

Investments

Areas where federal investments, focused on energy communities, are most important, such as job creation, economic development, education, environmental remediation, and healthcare.

- The key to successful federal investment is building the deep, organic connections at the local level necessary to understand the actual needs of communities, workers and their families. All these federal investments can, of course, play a critical role but a ‘bottom-up’ approach must be used to ensure that funding meets need as defined by the affected communities and persons. Government should coordinate and leverage resources across agencies, *in close collaboration with local stakeholders*, in order to ensure successful long-term outcomes.
- IWG should prioritize direct outreach and assistance based on a criteria of (i) plant or mine contribution to the local tax base, (ii) affected worker wage and benefit rates and wage value compared to the immediate area or the communities in which the workers live, and (iii) the number of indirect jobs and economic activity impacted by the closure.

Examples of federal programs that are working well to support energy workers and community revitalization and what specifically makes those programs successful.

- The Partnerships for Opportunity Workforce and Economic Revitalization (POWER) Initiative launched during the Obama administration was a collaboration among four agencies: the Appalachian Regional Commission, the Economic Development Administration, the Employment and Training Administration, and the Small Business Administration. Key to the success of this program, however, was the presence of dedicated staff within the White House whose sole mission was to drive the implementation of this program without being distracted by other missions. Unfortunately, the limitation on the program was that funding was low given the number of communities affected and that the resources may not always have gone to the most distressed communities.²

¹ <https://www.dollarsandsense.org/archives/2015/1115brecher.html>

² <https://www.rff.org/publications/reports/power-for-transition-investment-in-coal-communities-through-the-partnerships-for-opportunity-and-workforce-and-economic-revitalization-power-initiative/>

Gaps where new or additional federal funding would be beneficial.

- Direct support for displaced energy workers is a major gap in ensuring that individual workers have a realistic pathway to new employment and career opportunities as we shift away from fossil fuels. While programs like the Dislocated Worker Grant Program³ and the Trade Adjustment Assistance Program⁴ exist in other areas of the economy, these programs have shown mixed results, are not targeted specifically at coal workers, and the need is far greater than available resources.
- Communities that are heavily dependent on tax revenue from coal fired-power plants and coal mines are vulnerable to severe budget cuts as these facilities close.⁵ These places need temporary tax revenue replacement as they work to retool and diversify their economies. There is precedent for federal government interventions to support local communities: the Secure Rural Schools Program (SRS) within the Department of Agriculture.⁶ Since 1908, the U.S. Forest Service has provided a portion of funds generated through multi-use activities (e.g., multi-use activities, grazing, and special use permits) to counties to maintain roads and public schools. SRS was established in 2000 after years of declining revenues in order to stabilize funding to rural counties.

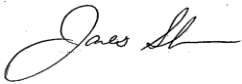
Policy

In addition to funding and technical assistance, where can the Federal Government better support energy workers and their communities as the nation transitions its energy mix.

- A report by the Union of Concerned Scientists and the Utility Workers Union of America describes the comprehensive set of resources and programs needed to help coal workers recover from job loss and give them a fighting chance to thrive in the wake of coal closures.⁷
- Several policy platforms and priorities have articulated the range of issues that must be addressed to ensure that energy workers and communities are able to share in the benefits of clean energy economy.⁸

In closing, serious approaches to policy, grounded in social and economic realities will need to be considered if we are going to responsibly reduce carbon in the nation's energy systems without continuing to damage workers, their families and their communities as has been occurring for the last 20 twenty years at a minimum. Balanced energy solutions should include providing options and incentives that workers, families and communities can access to meaningfully reorder their futures based on real world need.

Sincerely,



James T. Slevin
National President
Utility Workers Union of America, AFL-CIO

³ <https://www.dol.gov/agencies/eta/dislocated-workers>

⁴ <https://www.dol.gov/agencies/eta/tradeact>

⁵ <https://www.brookings.edu/research/the-risk-of-fiscal-collapse-in-coal-reliant-communities/>

⁶ <https://www.fs.usda.gov/working-with-us/secure-rural-schools>

⁷ <https://www.ucsusa.org/resources/support-coal-workers>

⁸ <https://nationaleconomictransition.org/>; <https://www.bluegreenalliance.org/resources/bluegreen-alliance-national-energy-transition-policy-framework0/>