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**Ann Marie Dryden Comments - Power Direct Energy on HOMES
P4P Solicitation Program**

Additional submitted attachment is included below.

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Power Direct Energy Comments to the California Energy Commission

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The HOMES Pay-for-Performance (P4P) Program is designed to advance equity and bring benefits to underserved communities. We strongly support this goal and would welcome the opportunity to participate, including as a subcontractor alongside our consulting partners. We are a CA woman-owned business that would like nothing more than to be part of a California EE program in our home state.

However, a P4P structure creates too much risk for smaller and midsize companies, as well as for our larger prime teaming partners. Many factors that affect energy savings—such as housing stock, customer behavior, or financing—are outside an implementer's control. If compensation only comes after savings are fully verified, smaller and community-based organizations may not be able to participate at all, leaving the hardest-to-reach households without support.

We recommend the CEC incorporate **milestone-based incentives** (e.g., enrollment, installation, and performance payments) to share risk more fairly. This would preserve accountability while making the program workable for diverse providers and ensuring that underserved communities are reached as intended.

Respectfully submitted,

Ann Marie Dryden
CEO and Managing Partner
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