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California Energy Commission
715 P Street
Sacramento, CA 95814

RE: California Building Energy Action Plan Draft Report, December 2025

Dear California Energy Commission,

Thank you for your engagement with the Disadvantaged Communities Advisory Group to provide feedback on the Draft California Building Energy Action Plan. This work is critically important for decarbonizing buildings along a pathway that ensures access to clean, affordable energy for all, including the state's low- and moderate-income households, renters, tribes, disadvantaged communities, hard-to-reach communities, and others that have historically faced barriers to decarbonization. Many of these same households are also struggling to pay rising utility bills. We are pleased to see that the report's top recommendations include maintaining a focus on equity, and designing programs to reach these households, alongside other key goals. We are glad to see such a comprehensive effort tackling such a wide array of building decarbonization challenges, from strategies to minimize upfront costs through panel optimization to efforts to overcome workforce development barriers in rural communities.

We largely support the recommendations described in the Draft Report. Our feedback includes a few suggestions to increase the impact of some of these recommendations:

1. **Demand flexibility and response:** When developing efficiency and electrification measures, consider approaches to increase access to demand flexibility and demand response programs at the same time. For example, alignment of electrification efforts with support for access to WiFi may reduce barriers to participation in demand response programs. Demand flexibility can enable households to better respond to time-of-use rates, and households participating in demand response programs receive additional compensation, further reducing their bills and improving energy affordability.

2. **Building remediation and upgrades:** We strongly support the focus on tackling up-front barriers to efficiency and electrification measures in order to enable more widespread adoption. The recommendation to increase data collection on relevant remediation costs, upgrade needs, and program deferrals will be essential for designing and funding effective programs and measuring their impact. Due to the high costs of addressing many of these barriers, we suggest also looking for alignment with existing programs achieving

complementary goals, such as: 1) mold and asthma trigger remediation or other public health interventions aligned with weatherization upgrades (for example, see the Contra Costa County Asthma Initiative); 2) broadband access to enable demand response (e.g. Broadband for All); 3) shifting from master-meter to individual meters at mobile home parks (e.g. CPUC programmatic efforts, combined with strategies to address this barrier in non-IOU territory).

3. **Enabling stacking of funding:** Consider additional efforts to enable households to simultaneously learn about and access multiple funding and financing streams, such as a one-stop-shop coupled with bridge funding to support project development when incentives may arrive at different times or only after project completion. Ideally, this would include approaches to layer in non-energy funding (e.g. for asthma or lead remediation) when available. Consider also, categorical eligibility, co-marketing, and stacking with energy equity programs that support affordable fuel switching by increasing access to low- and no-cost DERs, such as SOMAH, DAC-SASH, SGIP, and the DAC-GT program. In addition, policymakers should consider incorporating a point-of-sale incentive option that allows rebates or subsidies to be applied directly at the time of equipment purchase or installation.

4. **Priority households:** We appreciate the emphasis on reaching certain priority and hard-to-reach communities, such as tribes, justice communities, low-income communities, and those living in manufactured housing. Within these populations, there are also certain households with specific vulnerabilities or climate and pollution exposures that would uniquely benefit from access to building decarbonization measures. For example, it may be beneficial to target households with high arrearages or who have faced utility disconnections for non-payment for cost-saving energy interventions. Resilience measures such as weatherization or storage may particularly benefit the elderly, those with underlying medical conditions, or families with children, among others. HVAC system upgrades with high-quality air filters may have increased benefits in areas with poor air quality or frequent exposure to wildfire smoke. We suggest that program implementation data be collected to evaluate how well programs are reaching these populations, and improve design to ensure that those who need these benefits most have access to building decarbonization measures.

5. **Consumer protections:** We agree that access to low- and zero-interest financing is critical for enabling broad access to building decarbonization measures. Within this context, we also want to ensure there are appropriate consumer protection guardrails in place for any approved financing strategy, and that there is a clear venue for consumers to vet financing providers and ensure they are legitimate and not predatory.

6. **Non-energy impacts and cost-effectiveness:** We appreciate the stated potential for alignment between building decarbonization strategy and the Non-Energy Impacts Informational Proceeding. We support ongoing work to actively quantify and collect data on these non-energy impacts, and encourage better integration of these impacts and benefits into the determination of which building decarbonization measures are considered "cost-effective." We also believe that better quantification of these benefits, and evaluation of projects to demonstrate their effectiveness at achieving non-energy benefits, may help unlock additional funding opportunities for decarbonization measures (e.g. demonstrated public health benefits may help open public health financing streams).

7. **Resource adequacy:** Improved data collection may also have ripple effects across the energy sector, such as the ability to better evaluate demand reduction/flexibility and resource adequacy benefits of building decarbonization—which may limit the need for expensive and redundant utility-scale investments. In this last category, we suggest designing data collection that accurately captures and takes into account the unique circumstances that Tribes data collection may require, in consultation with CEC divisions' and other agencies responsible for resource adequacy to ensure that data can be easily integrated into resource adequacy and reliability assessments—and ultimately, we hope that the reliability and capacity value of any relevant distributed energy resources is fully compensated, further bringing down the lifetime costs of adopting these decarbonization measures.

8. **Outreach:** Invest in community-based organization technical capacity and ability to act as a trusted messenger for the long-term. Case management should not be treated as an add-on, but rather high-touch service delivery is core infrastructure for equitable decarbonization.

Overall, we appreciate and encourage the emphasis on data collection, transparency, and benchmarking across multiple initiatives throughout the Draft Plan, including equity metrics, which will better enable program evaluation, refinement, and impact.

Thank you for bringing this Draft Plan to the Disadvantaged Communities Advisory Group for feedback, and for consideration of our comments.

Sincerely,

The Disadvantaged Communities Advisory Group