

<b>DOCKETED</b>	
<b>Docket Number:</b>	23-DECARB-03
<b>Project Title:</b>	2025 California Building Energy Action Plan
<b>TN #:</b>	268754
<b>Document Title:</b>	Marc Costa Comments - 23-DECARB-03 2025 CBEAP TEC Comments
<b>Description:</b>	N/A
<b>Filer:</b>	System
<b>Organization:</b>	Marc Costa
<b>Submitter Role:</b>	Public
<b>Submission Date:</b>	2/20/2026 5:11:32 PM
<b>Docketed Date:</b>	2/23/2026

*Comment Received From: Marc Costa*  
*Submitted On: 2/20/2026*  
*Docket Number: 23-DECARB-03*

**23-DECARB-03 2025 CBEAP TEC Comments**

*Additional submitted attachment is included below.*



523 W 6th St, Ste 410

Los Angeles, CA 90014

231-797-7777

[energycoalition.org](http://energycoalition.org)

February 20, 2026

Re: Docket Number: 23-DECARB-03

## **CALIFORNIA ENERGY COMMISSION DRAFT COMMISSION REPORT: 2025 CALIFORNIA BUILDING ENERGY ACTION PLAN**

On behalf of the California Energy Commission, the Energy Coalition (TEC) respectfully submits these public comments in response to the Draft 2025 California Building Energy Action Plan (Plan) which was presented through a staff workshop on January 29, 2026 to interested parties to the Docket Number: 23-DECARB-03.

### **I. Introduction**

The Energy Coalition (TEC; <https://energycoalition.org/>) is a 501(c)3 nonprofit organization whose mission is to empower communities to leap into the future of clean energy.

TEC appreciates and commends the California Energy Commission for the comprehensiveness, technical depth, and thoughtful integration of equity considerations in the 2025 California Building Energy Action Plan. The Plan reflects a serious commitment to addressing the complexity of building decarbonization across California's diverse building stock and communities..

### **II. Comments**

The following comments uplift selected Plan elements and also recommend additional focus areas, based on our 50 year experience implementing building energy efficiency and decarbonization programs and policy.

#### **Chapter 2: Major Issues In Building Decarbonization**

##### ***Issue #1 - Financing***

TEC supports the Plan's recognition that affordable financing is essential to scaling decarbonization. In practice, financing must account not only for equipment costs, but also for integrating the value stack of non-energy impacts that decarbonization brings to California's residents, businesses, and the larger power system as a whole. Financing must also account for necessary remediation measures that often present barriers to project completion. TEC recommends that the state, in a multi-agency fashion, integrate the



523 W 6th St, Ste 410

Los Angeles, CA 90014

231-797-7777

[energycoalition.org](http://energycoalition.org)

full value stack of decarbonization. One area of focus includes promoting and expanding tariff-on-bill financing programs for all IDSM interventions inclusive of remediation costs. Innovative partnerships with public and private entities associated with health care and insurance are required to scale the size of investment required to achieve statewide 2045 decarbonization targets.

### ***Issue #5 - Remediation Costs for Residential Buildings***

Through an EPIC-funded CEC Advanced Energy Communities demonstration grant, TEC identified a recurring structural barrier: aging or structurally inadequate roofs preventing rooftop solar installation in low- and moderate-income homes.

In practice, remediation needs — including roof replacement, electrical corrections, and safety upgrades — are often prerequisites to participation in decarbonization programs. Without integrated solutions, otherwise eligible households remain excluded. Rather than treating remediation as an ancillary cost to be financed, TEC recommends that the CEC consider structural innovations that reposition remediation as an infrastructure investment.

1. Establish a “Pre-Decarbonization Infrastructure Fund” for remediation in disadvantaged communities that:

- Covers roof replacement, panel safety upgrades, and structural corrections;
- Is capitalized using a blend of public funds, green bonds, and grid deferral value.
- This fund would operate in parallel to electrification programs, ensuring that homes are “DER-ready” before incentive dollars are deployed.

2. Tie remediation to grid value and non-wires alternatives whereby distributed solar and storage provide measurable grid value and can reduce system costs. As behind the meter and community assets become an increasingly critical component, or even a solution to power system constraints, remediation for customer infrastructure is just as critical as investor owned infrastructure. Some value streams that customer energy resources provide include:

- Locationally specific peak load reduction
- Local capacity deferral
- Voltage support
- Prosumer participation and dynamic pricing



523 W 6th St, Ste 410

Los Angeles, CA 90014

231-797-7777

[energycoalition.org](http://energycoalition.org)

The CEC should work with CPUC and stakeholders to evaluate whether DER-enabling remediation investments can be incorporated into non-wires alternative portfolios or distribution deferral frameworks.

### ***Issue #7 - Tenant Protections***

TEC commends the inclusion of strong tenant protections; however, we believe the Plan should expand beyond this element to include a systematic approach to serving renters directly with 120V portable devices such as electric appliances, batteries, portable solar panels, and air purifiers. To support renters' roles in decarbonization TEC recommends:

Establish a Statewide-Direct-to-Renter Decarbonization Initiative that encompasses a suite of CEC research, studies, and corresponding programs which include:

- Data collection via a “renter RASS<sup>1</sup>”,
- Research and development investment in technologies that better serve renters with their specific constraints. This effort should engage residential property owner industry groups, and should differentiate between mom-and-pop versus larger owners. These technologies should be focused on appliances and interventions that can be implemented **safely** in the absence of landlord involvement, panel upgrades, or new electrical circuits. This includes technologies that can detect and prevent circuit overload.
- Capturing the benefits of such a program that reflect the values and impacts, not just to renters but to the grid and to the State's goals. Such a program will lower GHGs much sooner than waiting to transform rental buildings with traditionally ‘unmovable’ owners.
- Accelerating decarbonization of the housing stock and units that have combusting equipment that will outlive the 2045 decarbonization deadline. Otherwise tenants will be left to suffer as climate change accelerates, and as disproportionate gas system costs fall upon those most in need.
- Creating and funding renter-specific evaluation studies related to energy, air quality, and comfort metrics within homes served by these newly created initiatives, such as TEC's Direct-to-Renter program, in order to quantify benefits including GHG reductions.

Thinking more broadly about decarbonizing *energy services* for the customer, rather than just decarbonizing the building itself shall advance this recommendation. The latter forces a focus on permanent alterations, but renters need help **now**.

---

<sup>1</sup> Residential Appliance Saturation Survey



523 W 6th St, Ste 410

Los Angeles, CA 90014

231-797-7777

[energycoalition.org](http://energycoalition.org)

### ***Issue #9 - Health Benefits of Building Decarbonization***

TEC strongly supports the Plan's recognition that building decarbonization delivers significant public health benefits, including improved indoor air quality, reduced exposure to combustion pollutants, enhanced cooling access during extreme heat, and improved respiratory outcomes. However, the Plan should move beyond acknowledging health co-benefits and instead establish mechanisms to integrate health system funding, metrics, and program design into decarbonization policy, as discussed in Issue #1 Financing.

TEC also encourages the Commission to leverage the ongoing non-Energy Impacts (NEI) proceeding to integrate methods and values that will result from the docket's efforts. These metrics shall play a critical role in supporting multiple issues in this Action Plan and TEC recommends NEIs serve a meaningful, not ancillary role in evaluating and planning the remaining actions needed to achieve 2045 goals across all responsible state agencies.

### ***Issue #10 - Data Standardization & Sharing***

TEC echoes the March 5, 2025 comments submitted by the Local Government Sustainable Energy Coalition (LGSEC) on the Energy Data Analysis Program (EDAP). Local governments are "sister agencies" to the Commission for purposes of data sharing in the obligations to conduct climate action planning and statutory obligations such as AB 39's Electrification Planning Act. Furthermore, local governments, in the form of Regional Energy Networks and CCAs rely upon timely, granular data delivering energy programs under the auspices of the CPUC. Furthermore, LGSEC noted that public universities and historic investment in public data tools such as the Energy Atlas contribute to shared resources that require continued investment to unlock the full potential of data access.

Beyond access to customer meter data stakeholders need electrical grid and gas infrastructure data for effective decarbonization planning. TEC urges the CEC to act with urgency while maintaining the appropriate privacy and security mechanisms in place to successfully deliver on the data access actions in this plan.

### ***Issue #12 - CEC Building Decarbonization Incentive Programs***



523 W 6th St, Ste 410

Los Angeles, CA 90014

231-797-7777

[energycoalition.org](http://energycoalition.org)

In order to scale outreach to low income and under-resourced households, we need to deliberately strengthen the capacity of community-based organizations (CBOs) throughout the state. CBOs are essential partners for multiple aspects of program design and implementation, and need to be deeply embedded in program operations, as participants turn to CBOs as trusted messengers and for guidance on program complexities and administration.

Investment in CBOs improves program performance by increasing enrollment and completion rates. Embedding long-term funding for CBO capacity-building into program design supports market transformation by ensuring that community institutions can sustain decarbonization efforts beyond a single project or funding cycle. But CBOs need dedicated, long term funding to support local hiring, high-road jobs, staff training, strategic planning, and more, to create thriving organizations that can continue to provide this crucial role.

TEC recommends that a dedicated focus on CBOs be identified as a separate issue area, in recognition of the pivotal role that CBOs play in the equitable implementation of decarbonization programs, and to create pathways to dedicated and long-term funding.

#### ***Issue #14 - Electric Vehicle Supply Equipment Retrofits***

Under an EPIC-funded CEC demonstration grant, TEC discovered a complex and lengthy process through the Division of the State Architect (DSA) for installing level-2 EVSEs at three schools. TEC recommends greater transparency into requirements, and streamlining of the DSA approval process, to better support under-resourced school districts.

TEC encourages the Commission to coordinate with relevant state entities to assist in the removal of barriers around state and local governments for standardized EVSE installations. Clear guidance, standardized design templates, and predictable timelines would materially improve implementation, particularly for disadvantaged school districts that may lack dedicated facilities staff. Addressing procedural barriers will help ensure that EV infrastructure deployment in public facilities proceeds efficiently and equitably.

/s Marc Costa

Marc Costa

Director of Policy and Planning

The Energy Coalition