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Comments from the California Climate & Energy Collaborative on the Building Energy Action Plan

Please accept the attached comments on the draft Building Energy Action Plan on behalf of the California Climate & Energy Collaborative (CCEC).

Additional submitted attachment is included below.

February 20, 2026

California Energy Commission
Docket #: 23-DECARB-03
Project Title: 2025 California Building Energy Action Plan



RE: California Climate and Energy Collaborative (CCEC) Comments on the Draft Building Energy Action Plan

Dear CEC Leadership and Staff,

The [California Climate and Energy Collaborative \(CCEC\)](#) welcomes the opportunity to provide comments in response to the California Energy Commission’s Draft Commission Report: California Building Energy Actin Plan.

CCEC is a program of CivicWell that supports California local governments and their partners in their efforts to advance community-driven energy efficiency, emissions reduction, and climate action by building the knowledge, partnerships, and tools needed for sustained local capacity and streamlining coordination of state and local practitioners to remove implementation barriers. Our network of local governments and their partners across the state are working to rapidly implement community energy efficiency, clean energy, electric vehicle and other climate actions, in alignment with State goals.

Many of the 4,000 participants of the CCEC network have a strong focus and track record on accelerating progress on existing building decarbonization and related workforce development initiatives in the last two decades, and unique knowledge and perspectives that can benefit the state as it sets forward this roadmap. Local and regional organizations regularly confront real world challenges and barriers in their efforts to empower and implement building decarbonization projects. In 2023, CCEC shared substantial insights via [comments](#) to the CEC related to its Inflation Reduction Act Residential Energy Rebate and Equitable Building Decarbonization programs, which we feel can continue to be useful in the development of this plan.

The CCEC network commends the state for endeavoring to create a Building Energy Action Plan. It will build upon tremendous progress and leadership in California related to energy efficiency, electrification, renewable energy and storage deployment, building codes, incentives and financing for emission reductions, and support for local initiatives like Regional Energy Networks, Community Choice Aggregation programs and other collaborative, place-based partnership models. We also recognize that decarbonization, affordability, reliability, and equity challenges facing California are unprecedented and critically entwined, and collaboration among State and local agencies is essential.

CCEC is continuously developing ways to foster better two-way communication between State and local agencies to more effectively reach mutual energy and climate goals, and we welcome greater collaboration with the State on this matter. In the past three years we have operated the [State and](#)

[Local Energy and Climate Coordination](#) (SLECC) statewide and regional meetings with participation across roughly 1,000 attendees from local governments, other place-based stakeholders, and a dozen State agencies. We greatly appreciate that CEC representatives engage with our network regularly through SLECC and various other state-local meetings, including recently to provide a brief update on the Building Energy Action Plan. We would welcome more direct opportunities to update and engage our network on this and other CEC plans and encourage staff to utilize the regular and well-attended communication venues we have available.

SLECC Findings

This year, CCEC released [a working draft of the 2025 SLECC Report](#) summarizing a large volume of input generously provided by over 1,000 state and local participants at nearly 20 statewide and regional (in person and virtual) convenings since 2023. The report shares what SLECC has learned about how California can deliver state and local solutions that really address the biggest barriers to accelerating place-based energy and climate progress. SLECC's work to date has identified 32 barriers to place-based progress under 7 topic areas, including 12 barriers specifically on the topic of Clean Energy & Building Decarbonization and 6 barriers on the topic of Funding Access & Capacity Building. The barriers most applicable to the Building Energy Action Plan are flagged below in the table on pages 3-6.

The SLECC Report, and corresponding online [dashboard](#), detail nuanced examples of how communities are experiencing these barriers, provide initial local and state solution opportunities, showcase success already being made, and propose where pathways to further progress currently exist within agencies, including through important state plans like this. Given how relevant our findings are to the content and purpose of the Building Energy Action Plan, we respectfully submit these comments and the associated SLECC report and dashboard into the record for CEC consideration.

Comments on Building Energy Action Plan & Alignment with SLECC Findings

CCEC would like to congratulate CEC staff for the many years of analysis and work necessary to complete a thoughtful draft of the Building Energy Action Plan.

General

We largely support the recommendations described in the Draft Report. In particular, CCEC expresses gratitude for plan's Recommendations #3 on prioritizing energy efficiency investments to improve affordability and #8 — "strengthen alignment across agencies and levels of government" — which explicitly calls for empowering local governments and suggests the CEC provide "incentives for targeted local planning projects" and ramp up "technical assistance for local code enforcement." We recommend that the plan share more details about possible mechanisms of funding sources that can empower energy efficiency and local governments. We also note that, in aggregate, the Building Energy Action Plan is almost exclusively focused on the state program and regulatory toolkit. We suggest the plan should include greater consideration and recognition of the extensive role local governments (e.g. Regional Energy Networks, CCAs and other local programs or regional coordination bodies) play – alongside the state - in place-based building energy program delivery.

The CCEC network appreciates the strong focus on the importance of energy efficiency and electrification (e.g. heat pumps), particularly in light of recent challenges in legislative and judicial forums, including this statement:

"Energy efficiency must remain a key strategy to make the clean energy transition affordable and cost-effective. Increased building energy efficiency will allow Californians to heat and cool their homes using less energy, helping keep utility bills affordable. At the grid level, increased energy efficiency will also lessen the need for new generation and help offset distribution upgrades, further helping with utility bill affordability. California is leading the way to use active energy efficiency — energy efficiency combined with load flexibility — which maximizes cost savings and reliability benefits."

While we agree that efficiency and electrification are key, a “comprehensive clean energy strategy for California’s buildings” should also fully consider how residential, commercial and public sector property owners approach building energy improvements. Property owners often wish to simultaneously incorporate related improvements like solar and storage that can help projects “pencil” financially while further lowering building emissions. We were surprised to see such little emphasis on these types of building energy improvements. Communities and customers across California consistently ask for the state to make it easier to conduct all necessary building energy improvements – or “Integrated Demand Side Management” (IDSM) projects - through better coordination, standardization, flexibility or stacking of available incentives or financing.

Finally, in future iterations on the plan, CCEC encourages the state to flesh out a full roadmap outlining specific actions that the State will take over time (and through which sectors and partners) to address the many barriers and opportunities thoughtfully presented in the plan. We would welcome the opportunity to engage with CEC in developing such a plan.

By Barrier

Below we compare and contrast the findings of the Building Energy Action Plan against the most applicable SLECC Report findings derived from extensive local engagement.

| BARRIERS OUTLINED IN THE SLECC REPORT | COMMENTS ON BUILDING ENERGY ACTION PLAN FINDINGS AND BARRIERS |
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| Clean Energy & Building Decarbonization | |
| <p>Barrier 2: Interconnection and Energization Processes (*): Transitioning vehicles and buildings to clean electricity is challenging due to electrical capacity constraints, delayed load studies, long interconnection and energization queues, and process inconsistency managed by the utilities.</p> | <p>The Building Energy Action Plan’s EV Supply Equipment Retrofits section states that “current permitting processes for utility interconnection and EVSE retrofits are often complex and fragmented, adding to the logistical hurdles building owners and contractors face,” which aligns with SLECC input.</p> <p>However, this section states that that CPUC removed barriers to interconnection. Our network shares that there is significant more room for reform (queue transparency, timelines, backlogs blocking EV charging</p> |

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| | <p>infrastructure as well as renewable energy and other types of development). We recommend reviewing the nuanced challenges and solution ideas we've captured in the SLECC Report and dashboard.</p> |
| <p>Barrier 3: Energy Affordability & Rates (*): California faces rapidly rising electricity rates driven by escalating system costs creating significant affordability challenges for many households and businesses, and undermining the financial feasibility of building energy and electrification upgrades.</p> | <p>The Building Energy Action Plan dedicates extensive treatment to electricity rate impacts on building decarbonization — directly addressing the affordability concerns raised by SLECC participants that compromise electrification progress. We appreciate that energy efficiency is appropriately discussed as a solution to utility bill affordability, and that the plan recommends prioritizing energy efficiency investments to improve affordability. CCEC recommends more specific actions to address the real drivers of bill increases outlined in the plan. We recommend reviewing the nuanced challenges and solution ideas we've captured in the SLECC Report and dashboard.</p> |
| <p>Barrier 4. Retrofit Feasibility (*): Building retrofits including efficiency, electrification, solar and storage upgrades are often difficult for property owners and renters across the state to install at scale due to high upfront costs, old building stock, contractor and market dynamics, and confusing, complex, unreliable, or hard-to-stack incentive and financing programs.</p> | <p>The plan covers this barrier in great detail and with high level of alignment with our network, including acknowledging remediation costs. Our network flags remediation as a program-eligibility blocker for the most disadvantaged households.</p> <p>We appreciate the inclusion of "program complexity" and "administrative requirements" for federal funds affect delivery timelines. We suggest it should more deeply evaluate the how difficult it is to access and stack state-funded incentive and financing programs.</p> <p>We appreciate that EBD Program's structure (regional administrators, community-based organization partnerships, regional funding allocations) reflects the use of regional structures or intermediaries that communities across California repeatedly suggest.</p> <p>Relatedly, the plan also addresses the importance of addressing hard-to-reach communities, but could better emphasize, celebrate, and utilize the CPUC's investment in Regional Energy Networks, which are designed to serve hard to reach areas and make building decarbonization improvements easier to complete.</p> <p>We appreciate the discussions and opportunities related to Home Ratings, which could highlight</p> |

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| | BayREN's new Home Energy Score program as an opportunity. |
| <p>Barrier 5: Codes & Standards (*): While California has one of the nation's strongest statewide energy codes, weak enforcement and limited local capacity undermine its impact. Efforts to go further through local reach codes can be highly political and result in legal challenges and are now constrained by a legislated moratorium.</p> | We appreciate that the plan evaluates and addresses code compliance for existing building retrofits. We suggest the plan should acknowledge barriers and opportunities related to recent legislative and judicial threats to local governments ability to adopt reach codes which further efficiency and electrification requirements, such as CA's local code moratorium, the Berkeley 9 th circuit ruling, and H.R. 3699 at the federal level. |
| <p>Barrier 7: Investment Decisions (*): Despite state goals related to distributed, localized energy resources, investments, regulatory decisions, and policies often discourage or hamstring clean energy deployment or favor centralized utility infrastructure.</p> | While insufficient investments are addressed in the plan (see below), we recommend addressing disproportionate investments specifically in DERs within the plan as it inhibits localized building decarbonization. |
| <p>Barrier 8: Workforce (*): The market of qualified workers necessary to construct and install clean energy projects and retrofits is not large enough, especially outside of major urban centers.</p> | We appreciate the focus on building local workforces through training and job opportunities, as this is consistent with local perspectives. The plan could identify opportunities to better empower and coordinate with and across the many local and regional agencies (e.g. RENs) providing long standing workforce programs in the contractor and building trades. |
| <p>Barrier 10: Data Access (*): California lacks consistent access to data about consumption, energy supply infrastructure, and other information that can inform CAPs, capital projects, and cost affordability impact analyses.</p> | We are very pleased with the strong position CEC takes in the plan on its role in data standardization and sharing, including energy data repository development and meter data access protocols. Local governments often share the need for state support on data access and share that they specifically need aggregated, anonymized data at census tract or zip code level for planning purposes, not just individual building data. |
| Funding Access and Capacity Building | |
| <p>Barrier 1: Insufficient Investment: Significant budget and funding constraints at local, state and federal levels prevent adequate investments and capacity in needed energy, climate and land use strategies.</p> | The report's honest acknowledgment that \$200 billion is needed to decarbonize California's residential stock, against limited public funding, aligns with one of SLECC's most prominent themes around insufficient investment. We'd like to see more emphasis on investment options beyond financing, including protecting existing energy efficiency investments and identifying more flexible non-rate-payer allocations for building energy needs beyond efficiency through recurring sources like the recently reauthorized Greenhouse Gas Reduction Fund. |

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| <p>Barrier 3: Application Burden & Accessibility: Competitive public grant applications are overly complex, confusing, and inflexible pass/fail processes that are oversubscribed with little standardization, extracting limited organizational capacity that could be used for action while creating prohibitively high costs and low success probabilities that discourage resource-constrained organizations from attempting to apply.</p> | <p>SLECC surfaced that local jurisdictions often know the state programs exist but lack capacity, templates, or technical assistance to integrate them into local building codes, reach codes, or community programs. Barriers and suggestions related to deploying funding more readily and strategically for place-based energy, climate, and other related needs have attracted the most urgency and consensus among SLECC participants.</p> <p>The plan should further address the challenges related to local accessibility of programs and funding to support building decarbonization, including supporting pre-development capacity for technical assistance and grant applications, and multiagency application standardization and coordination.</p> |
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Conclusion

We recommend that the State prioritize the concerns, ideas, opportunities and successes shared by communities across California and transmitted by CCEC through its SLECC initiative and comments. We encourage CEC to meaningfully integrate the barriers and solutions into the final version of the Building Energy Action Plan and its subsequent implementation.

Thank you for the opportunity to relay comments from our statewide network and add these important matters to the record in relation to the Building Energy Action Plan. We hope your agencies will continue to participate in our SLECC meetings and welcome an opportunity to help CEC more formally gather and share local experiences for future analyses. CCEC remains committed to coordinating with State and our extensive network of local governments and their partners and look forward to ongoing collaboration. Please do not hesitate to reach out to Angie Hacker at ahacker@civicwell.org if you have any questions. Please contact us if CCEC can be helpful in distributing information or coordinating listening sessions with our network.

Respectfully submitted by Angie Hacker, CCEC’s Statewide Best Practices Coordinator, on behalf of the California Climate and Energy Collaborative (CCEC).