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<td>Organization:</td>
<td>Bruce Naegel</td>
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<tr>
<td>Document Title:</td>
<td>Bruce Naegel Comments - On Build Implementation Plan</td>
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<td>Description:</td>
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<td>Building Initiative for Low-Emissions Development (BUILD) Program</td>
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<td>20-DECARB-01</td>
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On Build Implementation Plan

Additional submitted attachment is included below.
Comments on the BUILD Implementation Plan  
Bruce Naegel  
Sustainable Silicon Valley

Include docket number 20-DECARB-01 and "BUILD Implementation Plan" in the subject line and send to publicadvisor@energy.ca.gov.

Comments:

An implementation will be enhanced considerably with an outline or checklist on how it should work for an organization wishing to use the BUILD plan. Some thoughts on content:

- The buildings that are part of this plan
  - New Construction, Function conversion, 51% rebuild

- The requirements++
  - Building should be 100% electric, no gas connection

- Appliances
  - Electrical appliances need to meet specific energy efficiency levels.
  - Appliance types for all classes of buildings

- Technical GHG overview
  - If the buildings are truly all electric, the GHG of the Building will only be driven by the GHG content of the electricity feeding it.

- Source of funds
  - What is important to know
  - How does a group find the

- Record Keeping
  - How bills should be maintained
  - How do expenses get approved

- Training
  - Needs to be as extensive as SOMAH
  - References as to where to find the details

- Low Income
  - Building requirements for Low Income and the amount of reimbursement based on level of Low Income.
  - How does this program tie with other low income programs?
  - What are stackable programs and what are not
  - 