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Comments on RFI - Equitable Building Decarbonization Program

Additional submitted attachment is included below.



Following are Grant Management Associates comments on the Request for Information on the Equitable Building Decarbonization Program.

1.a. What criteria should be weighed more heavily or prioritized when scoring program proposals?

Program criteria should emphasize effective partnerships with clear engagement methods to reach owners of low to middle income households. Priority should be given to projects serving lower income levels with little to no cost share required.

1.b. . Should the CEC require all proposals to include independent, data-driven targeting of participants and eligible measures, or should the CEC itself contract to provide a single, program-wide tool to target participants and eligible measures that program administrators would be required to use?

The CEC should provide a single, program-wide tool so that measurement is consistent across regions and programs. If meter data is a required input, the CEC should establish how programs in IOU territory will access that data, assuming the approach is not intended to be house-to-house data gathering.

1.c. Should low-income and moderate-income households be incentivized at different levels?

Low income level households should receive low or not cost retrofits, with a sliding scale up the moderate income levels. Decarbonization retrofits may require a higher subsidy level than energy efficiency, which provides some financial incentive to the households through energy savings.

2. b. Should layering or leveraging other programs be a requirement for proposals or a prioritization when scoring proposals?

Layering of incentives seems logical. If this is a requirement, CEC should coordinate with the administrators of these programs to encourage collaboration. One potential consequence of layering is that incentives may be redirected from areas that do not have the equitable retrofit program and concentrate funding only in those awarded areas, making them less or inaccessible to other areas.

5.a. How should the CEC segment the state for a multiple-implementer solicitation?

The Fourth Climate Assessment regions provide a good model.

5.b. What opportunities for workforce development should be considered, encouraged, or leveraged

Workforce strategies likely vary between regions. Each partnership should integrate a successful workforce development organization into their team.

6.a. How can the CEC best facilitate awareness for residents and building owners within under-resourced communities to encourage program participation?



The program should include requirements for participation by representatives of CBOs for under-resourced communities and housing for under-resourced communities (e.g., affordable housing authorities).

6.c. Should CEC issue a Tribal-only solicitation ?

A tribal only solicitation may be the most effective approach to provide funding, as their partnership structures and engagement methods may differ from others seeking to implement the retrofits. Review criteria that accommodate these differing approaches may be challenging to create and apply.

8.a. What specific equipment and measures should be prioritized?

Measures that provide large greenhouse gas emissions reductions should be prioritized. Measures that can be installed across multiple households (e.g. multi family) that provide cost-effective approaches to maximizing GHG reduction should be prioritized. A secondary measure would be savings to low income households. A straightforward CEC methodology for estimating these reductions should be provided.

8.e. Should the CEC consider unique portfolios, technologies, and measures to reflect California regional diversity?

The CEC should provide information on how measures function with different climates, but allow the proposer to select measures they believe are effective for their region.