

DOCKETED

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Staff Questions to Guide Public Input on Draft Equitable Building Decarbonization Direct Install Program Guidelines

The California Energy Commission (CEC) is seeking input and comments on the Draft Equitable Building Decarbonization Direct Install Program Guidelines, which are available on the [program webpage](https://www.energy.ca.gov/programs-and-topics/programs/equitable-building-decarbonization-program) at <https://www.energy.ca.gov/programs-and-topics/programs/equitable-building-decarbonization-program>. To facilitate input, staff have developed the list of questions below. Comments are welcome in response to these questions and on any other topic related to the Equitable Building Decarbonization Program. In your comments, please consider including supporting rationale, data, and/or documents, if applicable. Comments are due by **June 30, 2023**.

Chapter 1, Program Overview

- 1. Section C, Program Components and Section D, Budget** (pages 2-4) present a proposed budget breakdown among Equitable Building Decarbonization program components. The budget prioritizes underresourced communities (through the Statewide Direct Install Program) and California Native American tribes and tribal members (through the Tribal Direct Install Program), as directed in the program's authorizing legislation.¹ The budget also includes a Statewide Incentive Program and reflects CEC's intention to direct a portion of initial funds to existing state programs with similar goals and focus areas to begin achieving program goals as soon as possible. Staff welcome feedback on the proposed budget breakdown.

Chapter 2, Statewide Direct Install Program

- 2. Section A, Regional Funding Allocation** (pages 5-6) includes a map of proposed Northern, Central, and Southern California regions and a corresponding budget allocation based on the relative population of underresourced communities in the three regions. Would you recommend any changes to the proposed regions or budget allocation?
- 3. Section B, Selection of Administrators** (page 7) states that program administrators will be required to partner with one or more community-based organizations (CBOs) for local and culturally appropriate outreach, education, and support for participating households and communities. In the context of the Statewide Direct Install Program, what specific activities or tasks do you believe will be the most important for participating CBOs to lead or engage in?
- 4. Section D, Initial Community Focus Areas** (page 8) proposes a process by which communities will be recommended for inclusion in the first phase of the program, recognizing the program does not have the funds to serve every underresourced home in the state. Would you suggest any changes to the proposed criteria for identifying initial focus areas?

¹ Assembly Bill 209 (Committee on Budget, Chapter 251, Statutes of 2022).

- a. The CEC plans to establish a pathway for communities not identified as initial focus areas to be included in a subsequent phase of the program. Do you have recommendations regarding the process and criteria by which such communities should be considered for inclusion?
5. **Section E, Household/Property Eligibility** (pages 9-10) includes proposed income verification requirements for participating households. In establishing income verification requirements, the CEC seeks a balance between good stewardship of public funds and ensuring the program benefits its intended recipients while avoiding overly stringent requirements that create barriers to participation. Would you suggest changes to the proposed income verification requirements to better achieve this balance?
6. **Section F, Household/Property Targeting** (page 11) proposes an approach by which the program will target the households most likely to benefit from decarbonization retrofits. Would you suggest different or additional targeting criteria?
7. **Section H, Set-Aside for Manufactured Homes** (page 11) proposes to set aside at least 5% of the Statewide Direct Install Program budget for manufactured and mobile homes, and to require that program administrators propose an intentional approach to serve these homes in recognition of their unique challenges to decarbonization. Would you suggest any changes to this approach to help ensure that the program is effective in serving households living in manufactured and mobile homes?
8. **Section I, Eligible Measures** (pages 12-15) lists measures eligible for funding through the program. Would you suggest changes or additions to the lists of required, eligible, and ineligible measures?
9. **Section J, Pricing and Cost Caps** (page 16) presents proposed cost caps for remediation measures. The purpose of cost caps is to balance the program's ability to meet the decarbonization needs of individual households with the responsibility to benefit as many households as possible in a meaningful way. The proposed approach is 'average' cost caps to allow the program to serve homes with a range of remediation needs. Would you suggest any changes to the proposed average cost caps?
 - a. What other funding resources could help cover deferred maintenance costs for participating households?

Chapter 4, Administration

10. **Section A, Program Coordination and Incentive Layering** (page 18) describes a proposed approach to coordinate with other programs and leverage other funding sources. Staff welcome input on this approach.
11. **Section B, Metrics and Data Collection** (pages 18-21) presents metrics that staff anticipate will be used to track progress toward the program's goals. Would you suggest changes or additions to the list of goals and metrics? Do you have

recommendations regarding the use of data and analysis to inform improvements to the program?

- 12. Section C, Tenant Protections** (pages 21-22) identifies proposed protections for tenants living in buildings retrofitted by the program. Staff continue to explore potential program design elements to ensure that the program does not negatively impact tenants. Would you suggest additional tenant protections?
 - a. What services, such as tenant education provided by community-based organizations, would tenants need to ensure that the proposed tenant protections are effective? Can you suggest specific organizations that could provide these services?

- 13. Section D, Workforce Standards and Requirements** (pages 22-23) describes applicable prevailing wage requirements and proposed elements that administrators would be required to include in a workforce plan. Would you recommend changes or additions to these workforce standards and requirements?
 - a. One proposed workforce element is a preference for local contractors. How would you recommend defining "local" for this purpose?